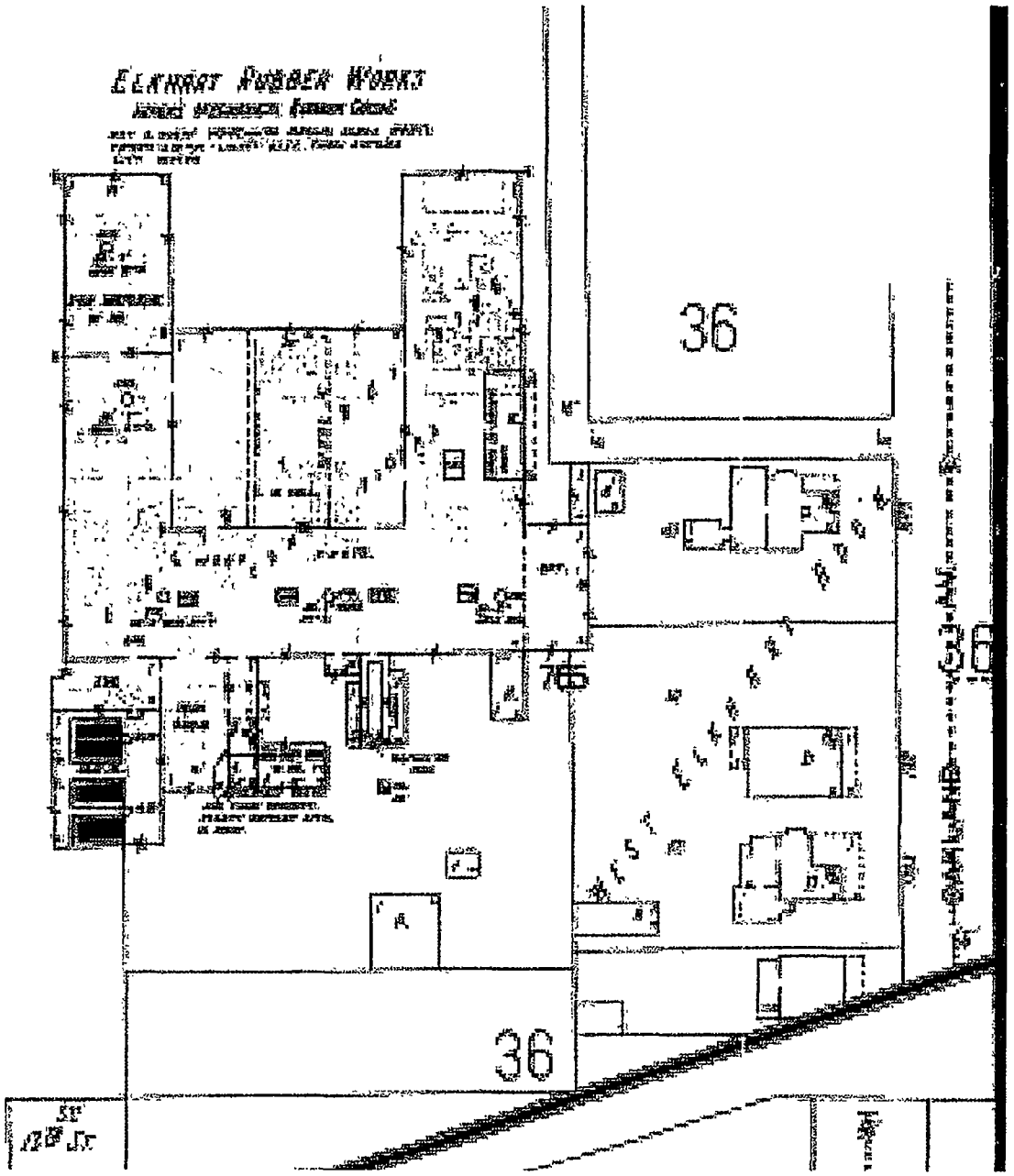
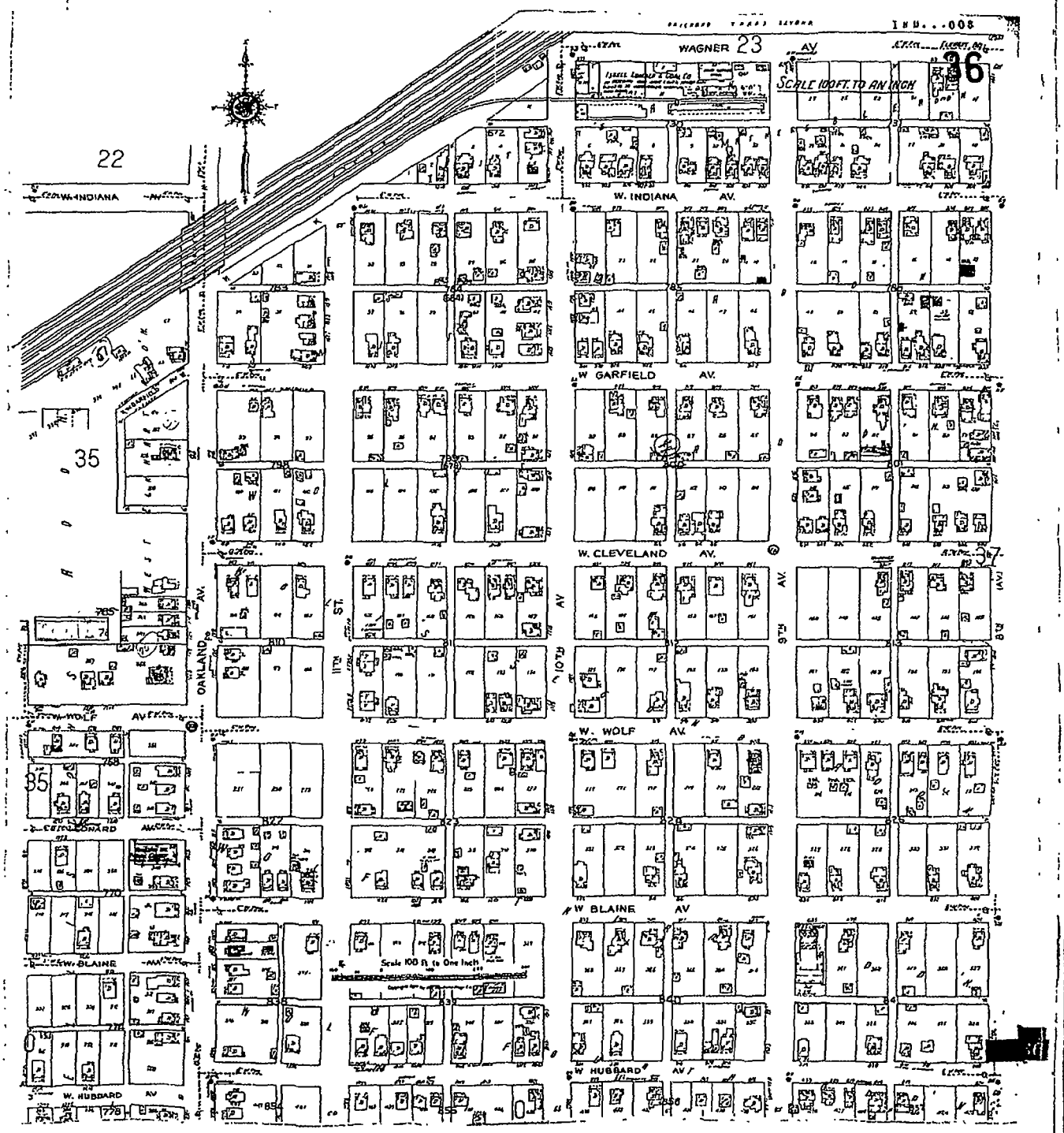
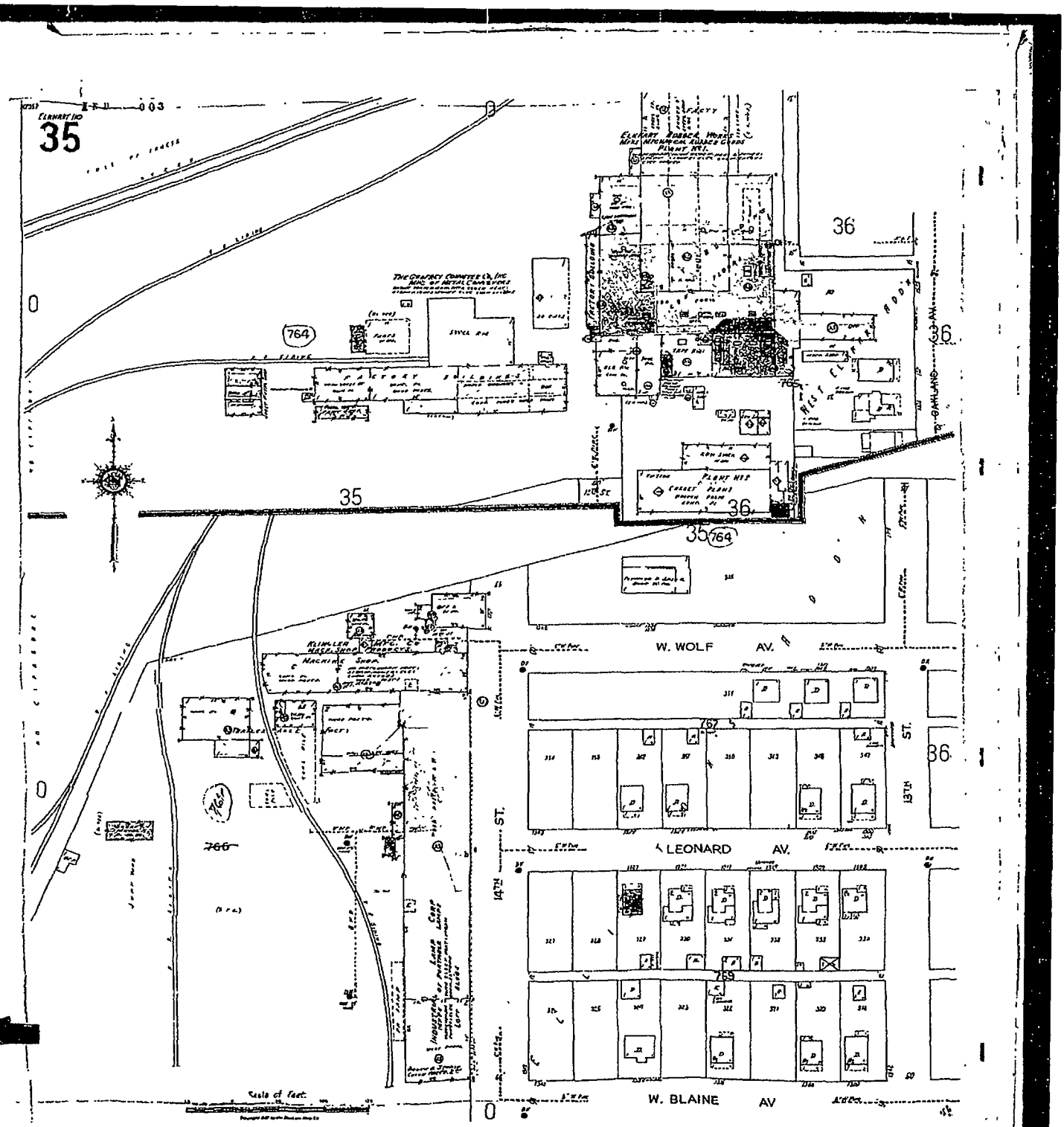
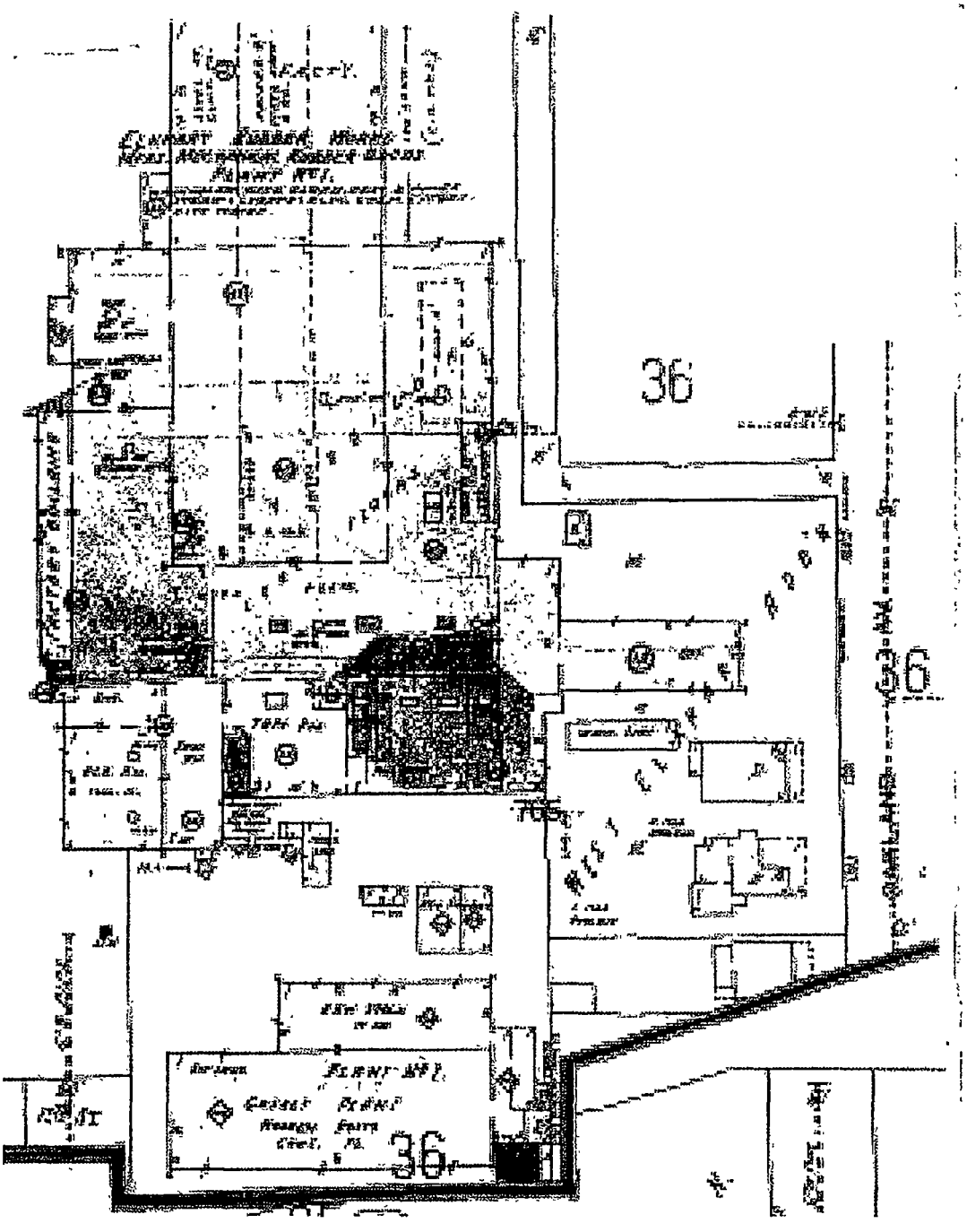


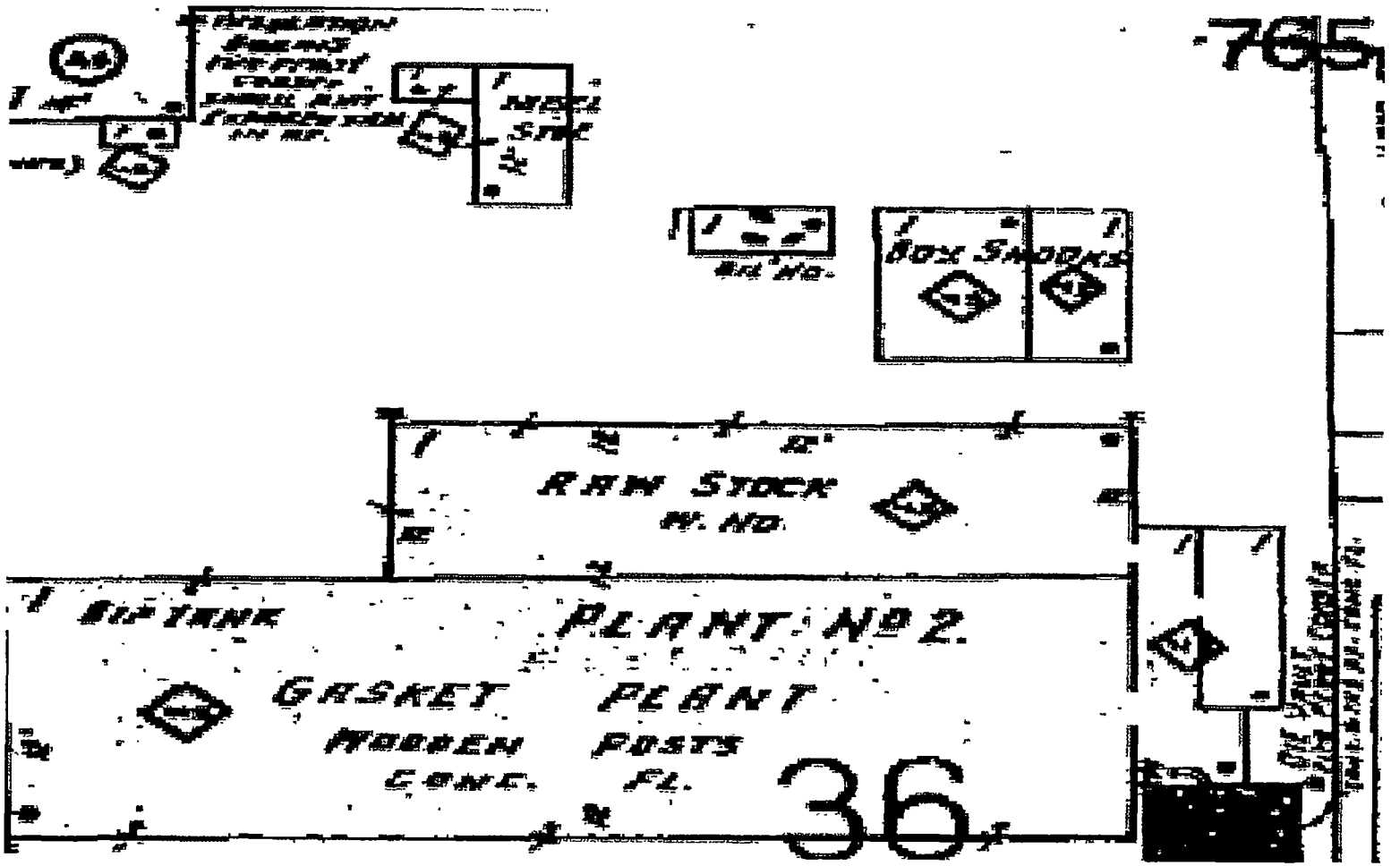
1927 Sanborn - Site



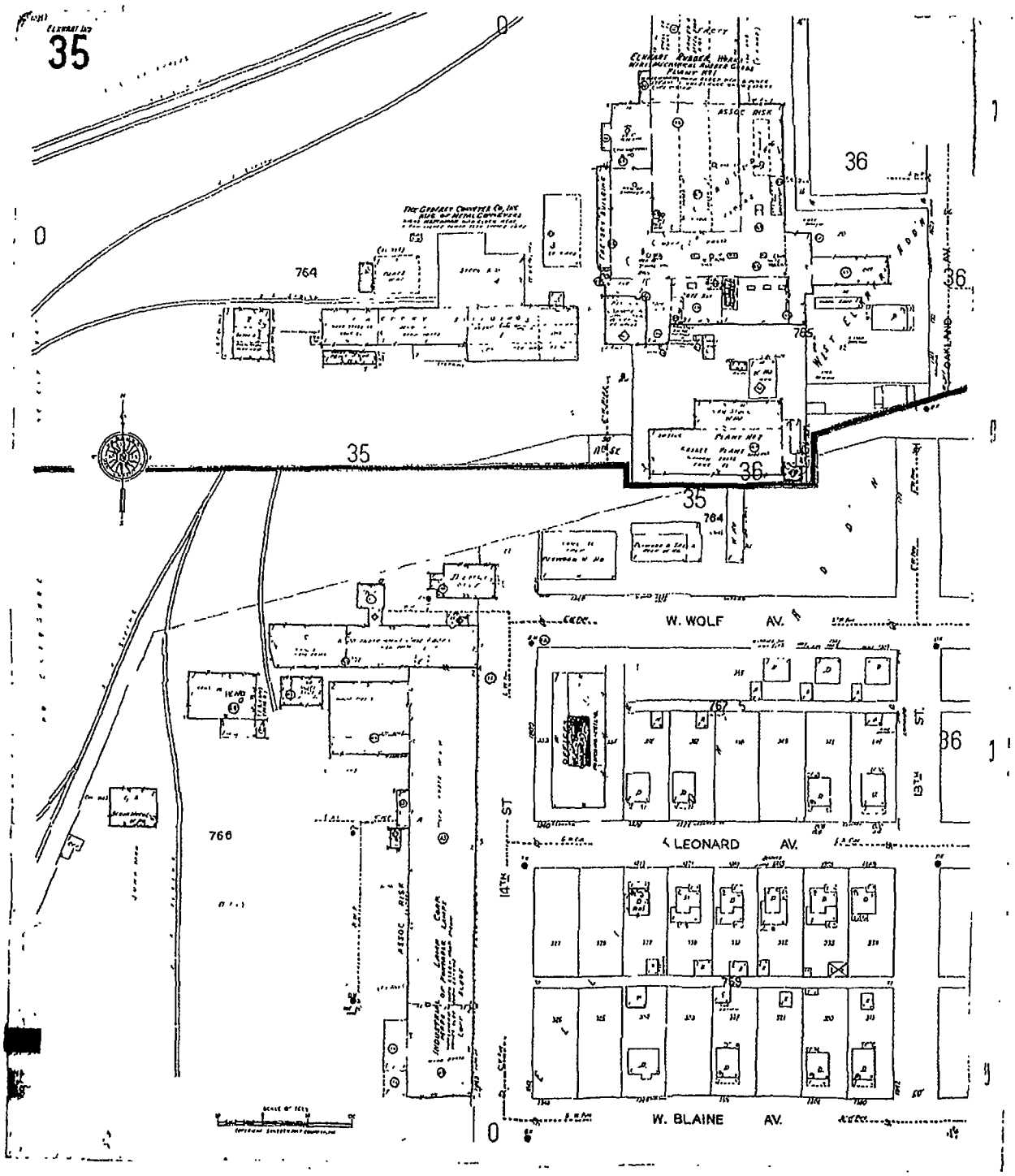


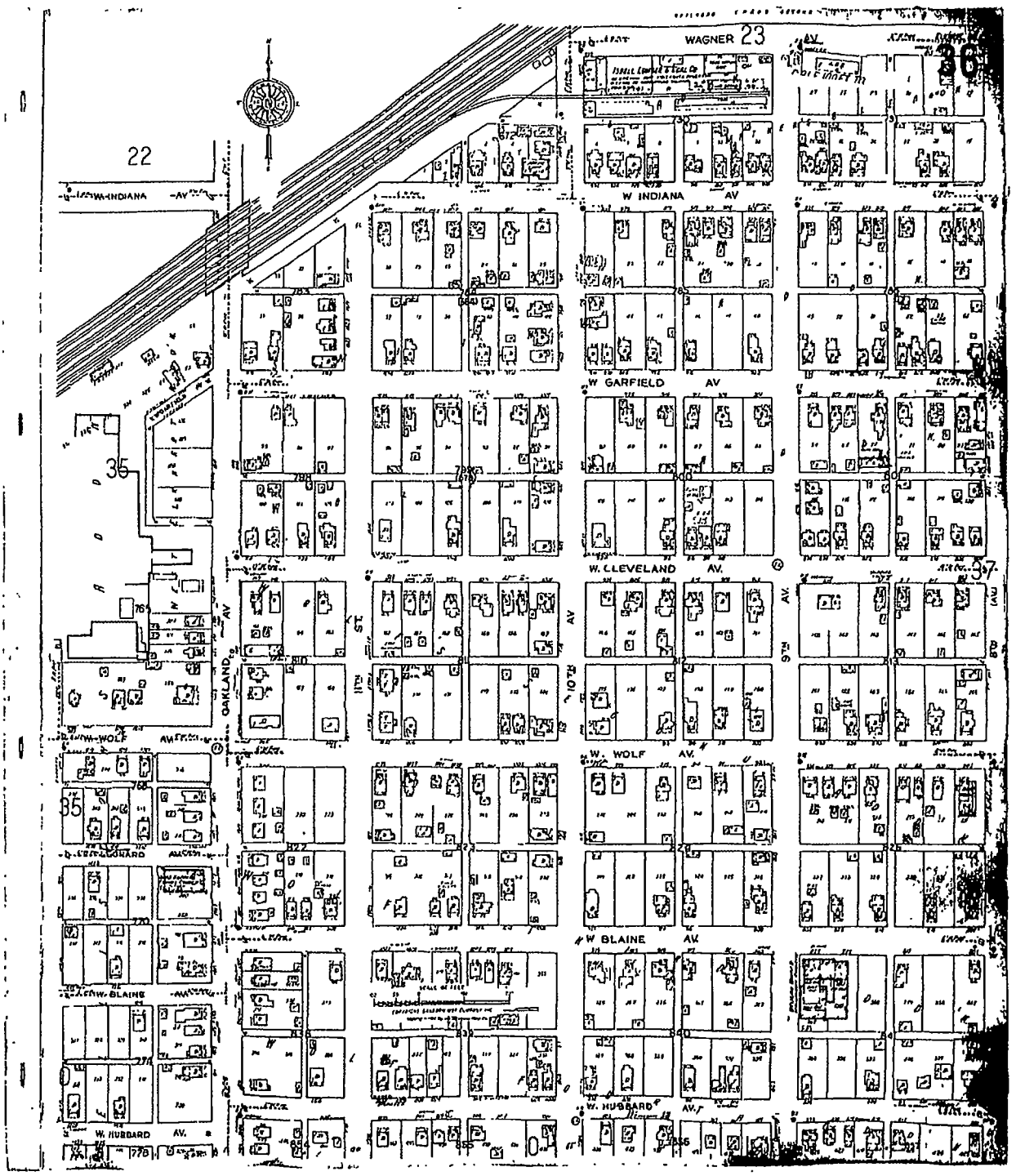


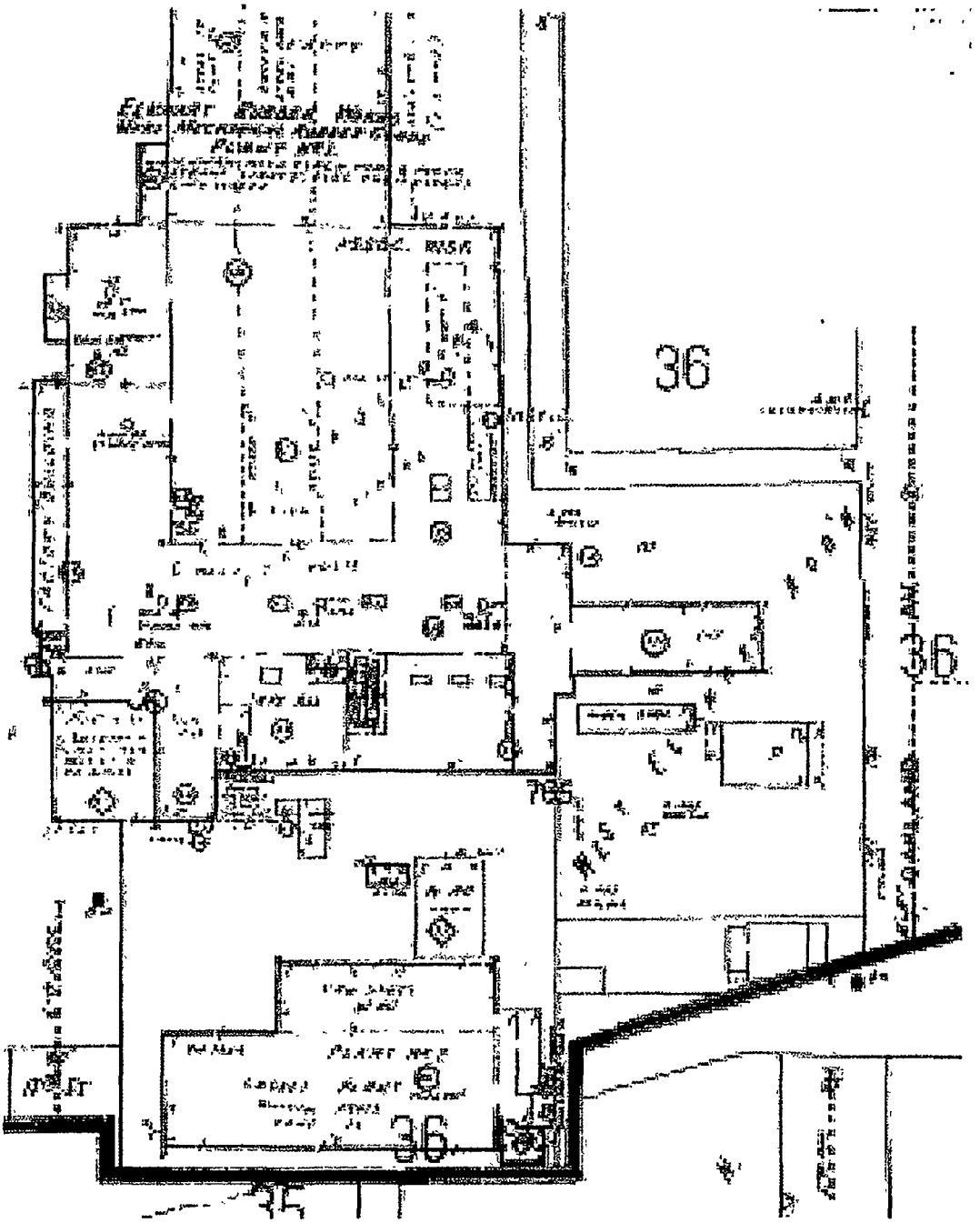
1950 Sanborn - Site



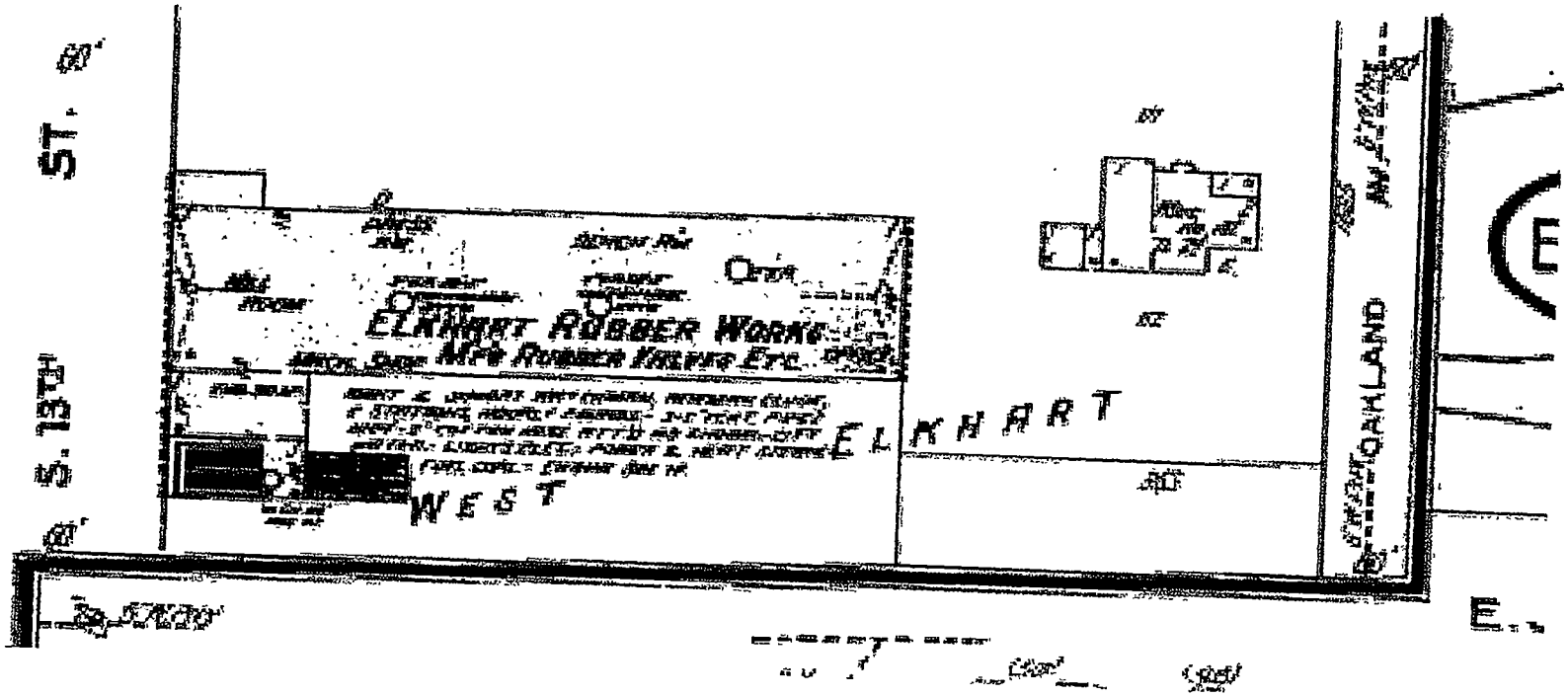
1950 Sanborn – Lower Plant







1968 Sanborn - Site



1910 Sanborn - Site

EDR™ Environmental
Data Resources Inc

The EDR-City Directory
Abstract

Sturgin Iron and Metal
1631 Oakland Avenue
Elkhart, IN 46516

February 02, 2005

Inquiry Number: 1351823-7

The Standard In Environmental Risk Management Information

440 Wheelers Farms Road
Milford, Connecticut 06460

Nationwide Customer Service

Telephone: 1-800-352-0050
Fax: 1-800-231-6802

Environmental Data Resources, Inc.
City Directory Abstract

Environmental Data Resources, Inc.'s (EDR) City Directory Abstract is a screening tool designed to assist professionals in evaluating potential liability on a target property resulting from past activities. ASTM E 1527-00, Section 7.3 on Historical Use Information, identifies the prior use requirements for a Phase I environmental site assessment. The ASTM standard requires a review of *reasonably ascertainable standard historical sources. Reasonably ascertainable means information that is publicly available, obtainable from a source with reasonable time and cost constraints, and practically reviewable.*

To meet the prior use requirements of ASTM E 1527-00, Section 7.3.4, the following *standard historical sources* may be used: aerial photographs, fire insurance maps, property tax files, land title records (although these cannot be the sole historical source consulted), topographic maps, city directories, building department records, or zoning/land use records. ASTM E 1527-00 requires *"All obvious uses of the property shall be identified from the present, back to the property's obvious first developed use, or back to 1940, whichever is earlier. This task requires reviewing only as many of the standard historical sources as are necessary, and that are reasonably ascertainable and likely to be useful."* (ASTM E 1527-00, Section 7 3 2, page 12.)

EDR's City Directory Abstract includes a search and abstract of available city directory data.

City Directories
City directories have been published for cities and towns across the U.S. since the 1700s. Originally a list of residents, the city directory developed into a sophisticated tool for locating individuals and businesses in a particular urban or suburban area. Twentieth century directories are generally divided into three sections: a business index, a list of resident names and addresses, and a street index. With each address, the directory lists the name of the resident or, if a business is operated from this address, the name and type of business (if unclear from the name). While city directory coverage is comprehensive for major cities, it may be spotty for rural areas and small towns. ASTM E 1527-00 specifies that a *"review of city directories (standard historical sources) at less than approximately five year intervals is not required by this practice." (ASTM E 1527-00, Section 7.3.2.1, page 12.)*

NAICS (North American Industry Classification System) Codes
NAICS is a unique, all-new system for classifying business establishments. Adopted in 1997 to replace the prior Standard Industry Classification (SIC) system, it is the system used by the statistical agencies of the United States. It is the first economic classification system to be constructed based on a single economic concept. To learn more about the background, the development and difference between NAICS and SIC, visit the following Census website: http://www.census.gov/epcd/www/naicsdev.htm.

Please call EDR Nationwide Customer Service at
1-800-352-0050 (8am-8pm EST)
with questions or comments about your report.
Thank you for your business!

4. SUMMARY

- ***City Directories:***

Business directories including city, cross reference and telephone directories were reviewed, if available, at approximately five year intervals for the years spanning 1945 through 2003. (These years are not necessarily inclusive.) A summary of the information obtained is provided in the text of this report.

Date EDR Searched Historical Sources:
City Directories Feb 02, 2005

Target Property:
1631 Oakland Avenue
Elkhart, IN 46516

PUR ID Year	*Uses*	*NAICS*	*Source*
-- 1945	Address not Listed in Research Source	N/A	Polk City Directory
-- 1959	Address not Listed in Research Source	N/A	Polk City Directory
-- 1964	Address not Listed in Research Source	N/A	Polk City Directory
-- 1969	Address not Listed in Research Source	N/A	Polk City Directory
-- 1974	Address not Listed in Research Source	N/A	Polk City Directory
-- 1979	Address not Listed in Research Source	N/A	Polk City Directory
-- 1983	Address not Listed in Research Source	N/A	Polk City Directory
-- 1988	Draggoo Electric Co		Polk City Directory
-- 1993	Draggoo Group Inc		Polk City Directory
-- 1998	Anew Company		Polk City Directory
-- 2003	Anewco		Polk City Directory

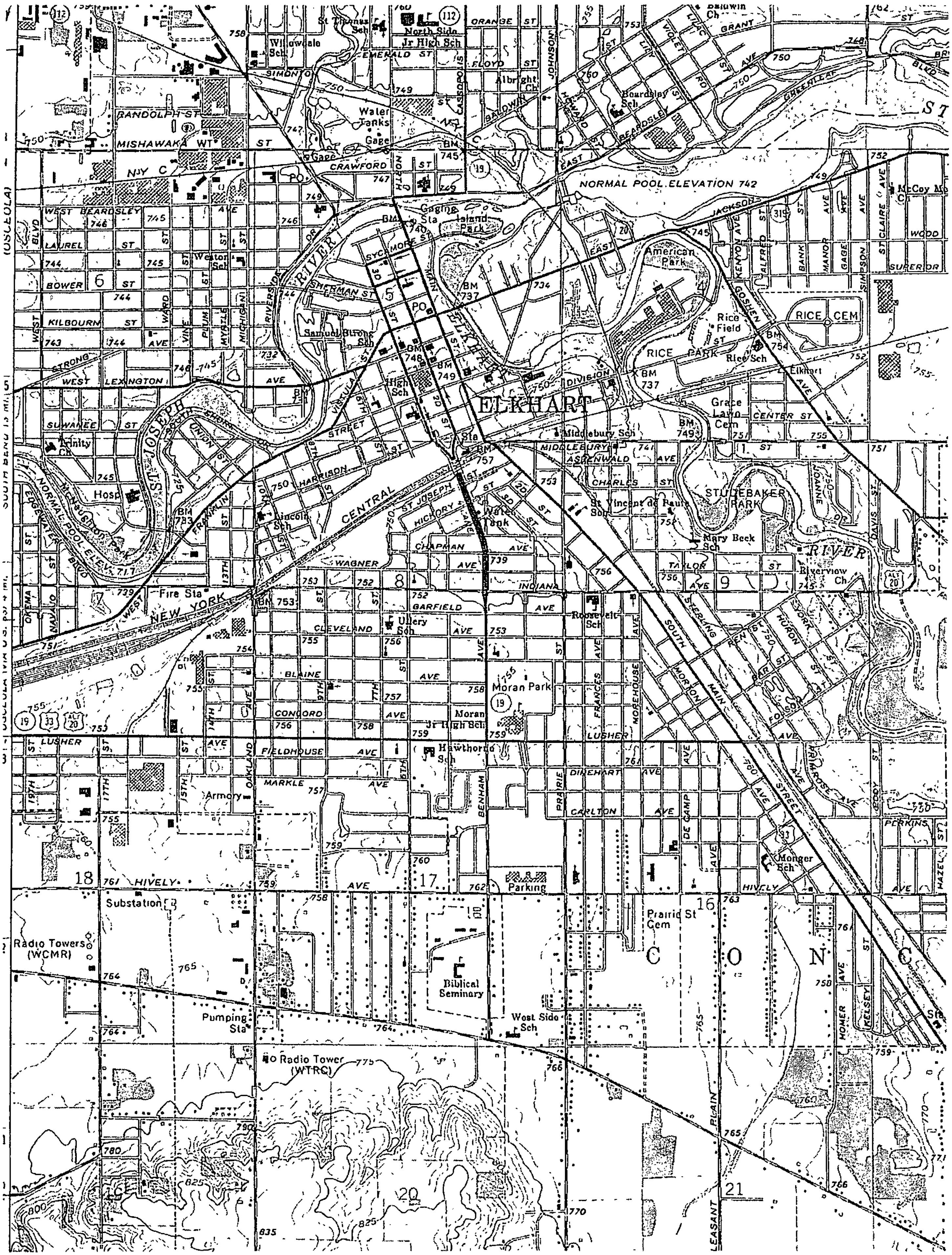
Adjoining Properties

SURROUNDING
Multiple Addresses
Elkhart, IN 46516

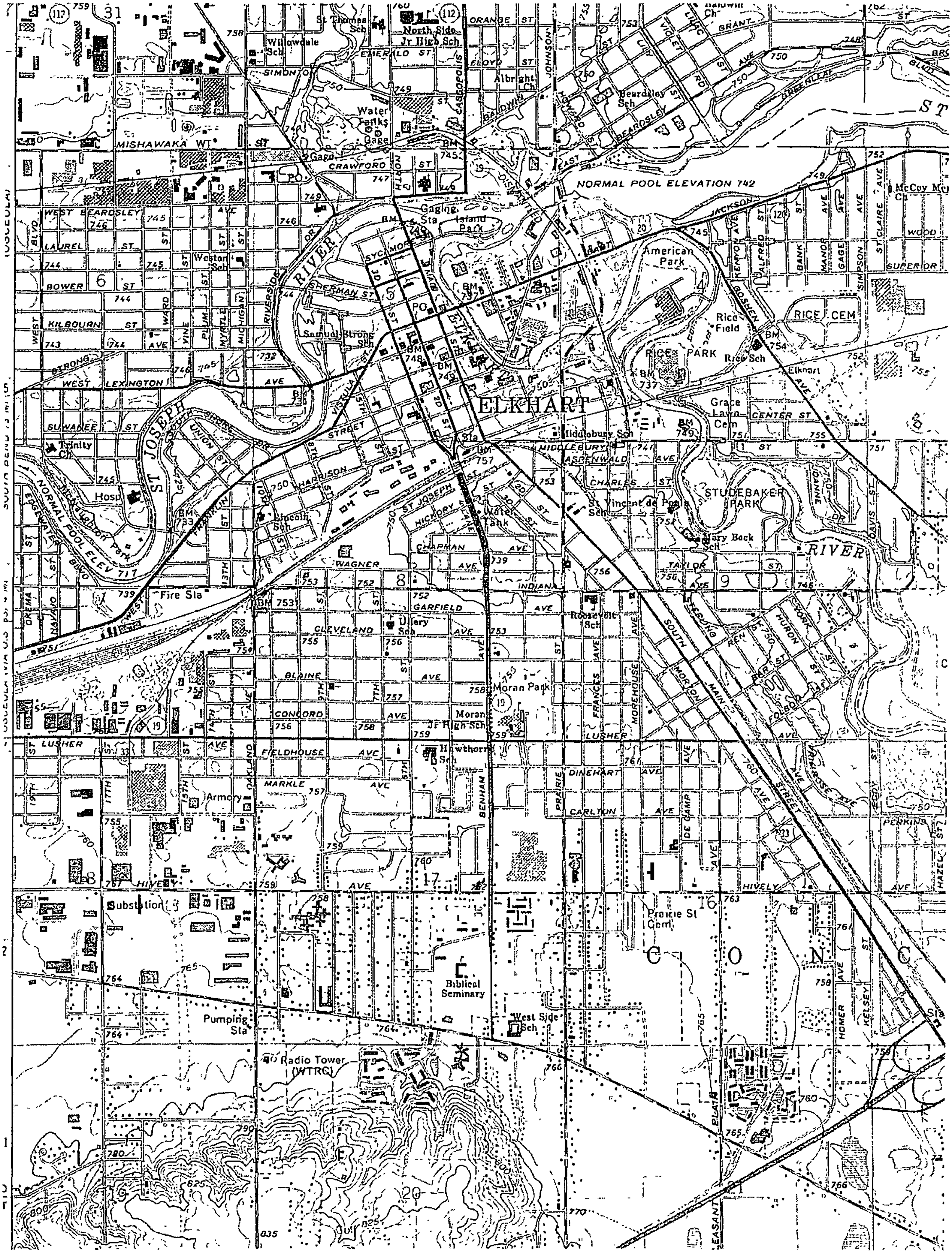
PUR ID Year	*Uses*	*NAICS*	*Source*
1945	**OAKLAND AVE**		Polk City Directory
	Vacant (1613)	N/A	
	Residence (1614)		
	Address not listed in research source (1629)	N/A	
	Residence (1701)		
	Residence (1703)		
	Residence (1707)		
	Residence (1711)		
	Abbott's Grocery (1712)		
	Residence (1715)		
1959	**OAKLAND AVE**		Polk City Directory
	Residence (1614)		

PUR ID Year	Uses	NAICS	Source
1959 (continued)			
	Elkhart Rubber Works Inc (1629)		
	Residence (1701)		
	Vacant (1703)	N/A	
	Residence (1707)		
	Residence (1711)		
	Oakland Avenue Grocery (1712)		
	Residence (1715)		
	-No other addresses within range		
1964	**OAKLAND AVE**		Polk City Directory
	Residence (1614)		
	Elkhart Rubber Works Inc (1629)		
	Residence (1701)		
	Residence (1707)		
	Residence (1711)		
	Nancy's Burger Store (1712)		
	Residence (1715)		
	-No other addresses within range		
1969	**OAKLAND AVE**		Polk City Directory
	Paul Willis, Trucker (1614)		
	Elkhart Rubber Works Inc (1629)		
	Residence (1701)		
	Residence (1707)		
	Residence (1711)		
	Oakland Food Mart (1712)		
	Residence (1715)		
	-No other addresses within range		
1974	**OAKLAND AVE**		Polk City Directory
	Paul Willis, Trucker (1614)		
	Elkhart Rubber Works Inc (1629)		
	Residence (1707)		
	Vacant (1711)	N/A	
	Rixter's Grocery (1712)		
	Residence (1715)		
	-No other addresses within range		
1979	**OAKLAND AVE**		Polk City Directory
	Paul Willis, Trucker (1614)		
	Elkhart Rubber Works Inc (1629)		
	Anchor Packing Co (1629)		

PUR ID Year	*Uses*	*NAICS*	*Source*
1979 (continued)			
	Residence (1707)		
	Oakland Market (1712)		
	Vacant (1715)	N/A	
	-No other addresses within range		
1983	**OAKLAND AVE**		Polk City Directory
	Vacant (1614)	N/A	
	Vacant (1629)	N/A	
	Residence (1707)		
	Rixter's Grocery (1712)		
	Residence (1715)		
	-No other addresses within range		
1988	**OAKLAND AVE**		Polk City Directory
	Paul Wilhs, Trash Hauler (1614)		
	Residence (1707)		
	Rixter's Grocery (1712)		
	Residence (1715)		
	-No other addresses within range		
1993	**OAKLAND AVE**		Polk City Directory
	Vacant (1614)	N/A	
	Vacant (1707)	N/A	
	Vacant (1712)	N/A	
	Vacant (1715)	N/A	
	-No other addresses within range		
1998	**OAKLAND AVE**		Polk City Directory
	Residence (1614)		
	Residence (1707)		
	Address not listed in research source (1712)	N/A	
	Address not listed in research source (1715)	N/A	
	-No other addresses within range		
2003	**OAKLAND AVE**		Polk City Directory
	Residence (1614)		
	Residence (1707)		
	Dave's Tax Svc (1712)		
	No Current Listing (1715)		
	-No other addresses within range		


ELKHART
NORMAL POOL ELEVATION 742
ST JOSEPH RIVER
Willowdale Sch
St Thomas Sch
North Side Jr High Sch
Albright Ch
Beardsley Sch
Water Tanks
Gage
Gaging Sta
Island Park
American Park
Rice Field
RICE CEM
Rice Sch
Grace Lawn Cem
Samuel Strong Sch
High Sch
Weston Sch
Trinity Ch
Hosp
Lincoln Sch
Middlebury Sch
St Vincent de Paul Sch
STUDEBAKER PARK
Mary Beck Sch
Riverview Ch
Roosevelt Sch
Ullery Sch
Moran Park
Moran Jr High Sch
Hawthorne Sch
Armory
Monger Sch
Parking
Substation
Radio Towers (WCMR)
Biblical Seminary
Pumping Sta
West Side Sch
Radio Tower (WTRC)
Prairie St Cem
Fire Sta
McCoy Me Ch
Baldwin Ch
NEW YORK CENTRAL
RANDOLPH ST
MISHAWAKA
CRAWFORD ST
WEST BEARDSLEY AVE
LAUREL ST
BOWER ST
KILBOURN ST
STRONG
WEST LEXINGTON AVE
SUWANEE ST
EDGEWATER BLVD
NORMAL POOL ELEV 717
FRANKLIN
HARRISON ST
ST JOSEPH
HICKORY
CHAPMAN AVE
WAGNER AVE
INDIANA AVE
GARFIELD AVE
CLEVELAND AVE
BLAINE AVE
CONCORD AVE
LUSHER AVE
FIELDHOUSE AVE
MARKLE AVE
DINEHART AVE
CARLTON AVE
HIVELY AVE
MIDDLEBURY
ASPENWALD AVE
CHARLES ST
TAYLOR ST
CENTER ST
DIVISION
JACKSON
WOOD
SUPERIOR
SOUTH MAIN STREET
PRAIRIE
FRANCES
MOREHOUSE
BENHAM
OAKLAND
PLEASANT PLAIN
HOMER AVE
KELSEY
PERKINS
EDDY ST
GOSHEN AVE
ORANGE ST
EMERALD ST
SIMONTON
FLOYD ST
GRANT
GREENLEAF BLVD
SYCAMORE ST
SHERMAN ST
C O N C
18
17
16
20
21
6
5
8
9
7


ELKHART
ST JOSEPH
RIVER
NORMAL POOL ELEVATION 742
NORMAL POOL ELEV 717
CONRAIL
MISHAWAKA
OSCEOLA
Willowdale Sch
St Thomas Sch
North Side Jr High Sch
Albright Ch
Beardsley Sch
Baldwin Ch
Water Tanks
Gage
Gaging Sta
Island Park
American Park
RICE CEM
Rice Field
RICE PARK
Rice Sch
Grace Lawn Cem
Middlebury Sch
St Vincent de Pauls Sch
STUDEBAKER PARK
Mary Beck Sch
Riverview Ch
Samuel Strong Sch
Weston Sch
Lincoln Sch
Trinity Ch
Hosp
Fire Sta
Roosevelt Sch
Moran Park
Moran JF High Sch
Hawthorne Sch
Armory
Substation
Radio Towers (WCMR)
Biblical Seminary
West Side Sch
Pumping Sta
Radio Tower (WTRC)
Prairie St Cem
Trailer Park
MAIN
SOUTH MAIN
STREET
JACKSON
LEXINGTON AVE
BEARDSLEY
FRANKLIN
HIVELY AVE
LUSHER AVE
CONCORD AVE
BLAINE AVE
CLEVELAND AVE
GARFIELD AVE
INDIANA AVE
WAGNER AVE
CHAPMAN AVE
HARRISON
MARION
STRONG
MIDDLEBURY
CHARLES
SIMONTON
CRAWFORD
EMERALD ST
ORANGE ST
FLOYD
KILBOURN ST
BOWER ST
LAUREL ST
SUWANEE ST
FIELDHOUSE AVE
MARKLE AVE
DINEHART AVE
CARLTON AVE
PRAIRIE
BENHAM
OAKLAND
MOREHOUSE
FRANCES
GOSHEN
C O N C


ELKHART
NORMAL POOL ELEVATION 742
ST JOSEPH RIVER
NORMAL POOL ELEV 717
North Side Jr High Sch
Willowdale Sch
Water Works Gage
Island Park
American Park
Rice Field
RICE PARK
RICE CEM
Rice Sch
Grace Lawn Cem
Middlebury Sch
St Vincent de Paul Sch
STUDEBAKER PARK
Mary Beck Sch
Samuel Strong Sch
Weston Sch
Trinity Ch
Hosp
McNaughton Park
Lincoln Sch
Fire Sta
Roosevelt Sch
Ulery Sch
Moran Park
Moran Jr High Sch
Hawthorne Sch
Armory
Substation
Prairie St Cem
Biblical Seminary
West Side Sch
Pumping Sta
Radio Tower (WTRC)
Beardsley Sch
Albright Ch
McCoy Mem Ch
MISHAWAKA
CRAWFORD ST
WEST BEARDSLEY AVE
LAUREL ST
BOWER ST
KILBOURN ST
WEST LEXINGTON AVE
STRONG AVE
SUWANEE ST
HARRISON ST
MIDDLEBURY ST
JACKSON BLVD
WAGNER AVE
INDIANA AVE
GARFIELD AVE
CLEVELAND AVE
BLAINE AVE
CONCORD AVE
LUSHER AVE
FIELDHOUSE AVE
MARKLE AVE
DINEHART AVE
CARLTON AVE
HIVELY AVE
BENHAM AVE
MAIN ST
SOUTH MAIN STREET
MORTON AVE
PRAIRIE ST
FRANCES AVE
MOREHOUSE
OAKLAND
CENTER ST
CHARLES ST
TAYLOR ST
GOSHEN AVE
ORANGE ST
EMERALD ST
SIMONTON
CASSOPOLIS
JOHNSON
SUPERIOR
C O N C

The EDR Aerial Photo Decade Package

Sturgin Iron and Metal
1631 Oakland Avenue
Elkhart, IN 46516

February 1, 2005

Inquiry Number: 1351823.5

The Source For Environmental Risk Management Data

440 Wheelers Farms Rd
Milford, Connecticut 06460

Nationwide Customer Service

Telephone: 1-800-352-0050
Fax: 1-800-231-6802
Internet: www.edrnet.com

THE EDR AERIAL PHOTO DECADE PACKAGE

Environmental Data Resources, Inc.'s (EDR) Aerial Photo Decade Package is a screening tool designed to assist professionals in evaluating potential liability on a target property resulting from past activities.

ASTM E 1527-00, Section 7.3 on Historical Use Information, identifies the prior use requirements for a Phase I environmental site assessment. The ASTM Standard requires a review of *reasonably ascertainable standard historical sources. Reasonably ascertainable means information that is publicly available, obtainable from a source within reasonable time and cost constraints, and practically reviewable.* To meet the prior use requirements of ASTM E 1527-00, Section 7.3.4, the following *standard historical sources* may be used: aerial photographs, fire insurance maps, property tax files, land title records (although these cannot be the sole historical source consulted), topographic maps, city directories, building department records, or zoning/land use records ASTM E 1527-00 requires *"All obvious uses of the property shall be identified from the present, back to the property's obvious first developed use, or back to 1940, whichever is earlier. This task requires reviewing only as many of the standard historical sources as are necessary, and that are reasonably ascertainable and likely to be useful."* (ASTM E 1527-00, Section 7.3 4, page 12).

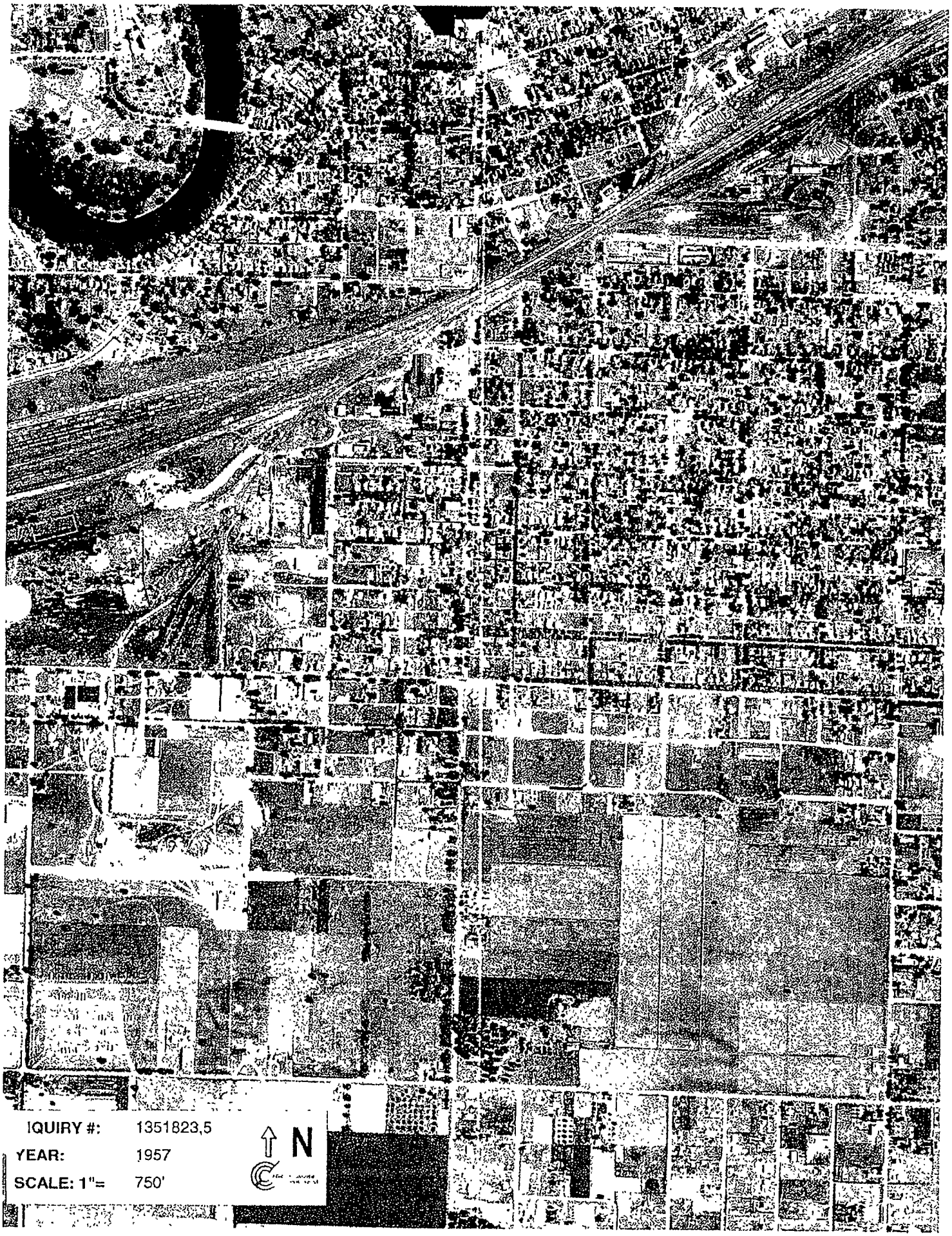
EDR has one of the nation's largest collections of historical aerial photography. EDR's Aerial Photo Decade Package provides digitally reproduced historical aerial photographs and includes one photo per decade, where available.

Please call EDR Nationwide Customer Service at
1-800-352-0050 (8am-8pm EST)
with questions or comments about this report.
Thank you for your business!

Date EDR Searched Historical Sources:
Aerial Photography February 01, 2005

Target Property:
1631 Oakland Avenue
Elkhart, IN 46516

PUR ID *Year*	*Uses*	*Portion-Findings (FIM Information Only)*	*Source*
1 1957	Aerial Photograph Scale: 1"=750'	Panel #: 2441085-F8/FlightDate: June 3, 1957	nat
2 1965	Aerial Photograph Scale: 1"=750'	Panel #: 2441085-F8/FlightDate: August 20, 1965	nat
3 1973	Aerial Photograph Scale: 1"=750'	Panel #: 2441085-F8/FlightDate: July 13, 1973	nat
4 1987	Aerial Photograph Scale: 1"=833'	Panel #: 2441085-F8/FlightDate: July 17, 1987	nat
5 1992	Aerial Photograph Scale: 1"=833'	Panel #: 2441085-F8/FlightDate: April 5, 1992	nat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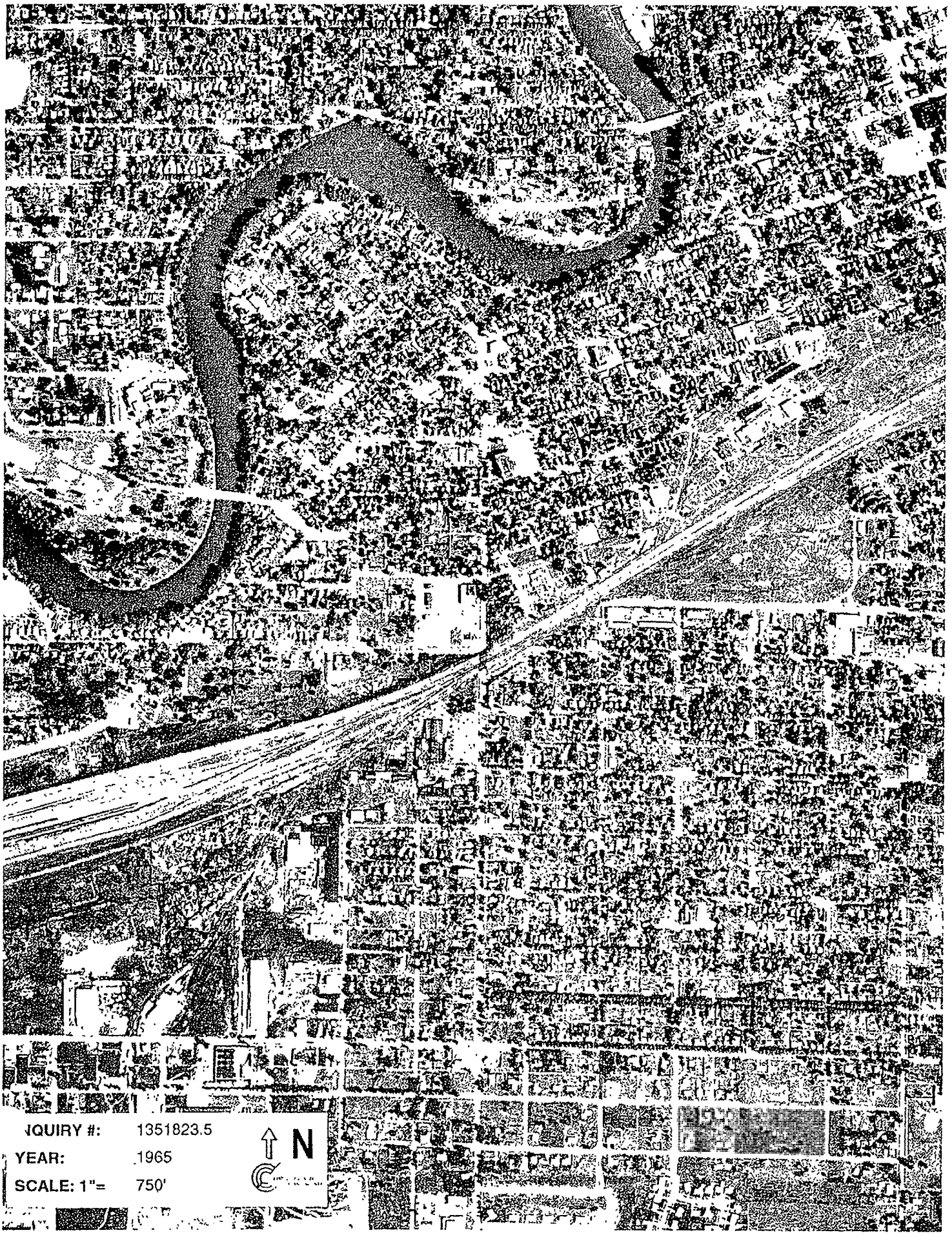
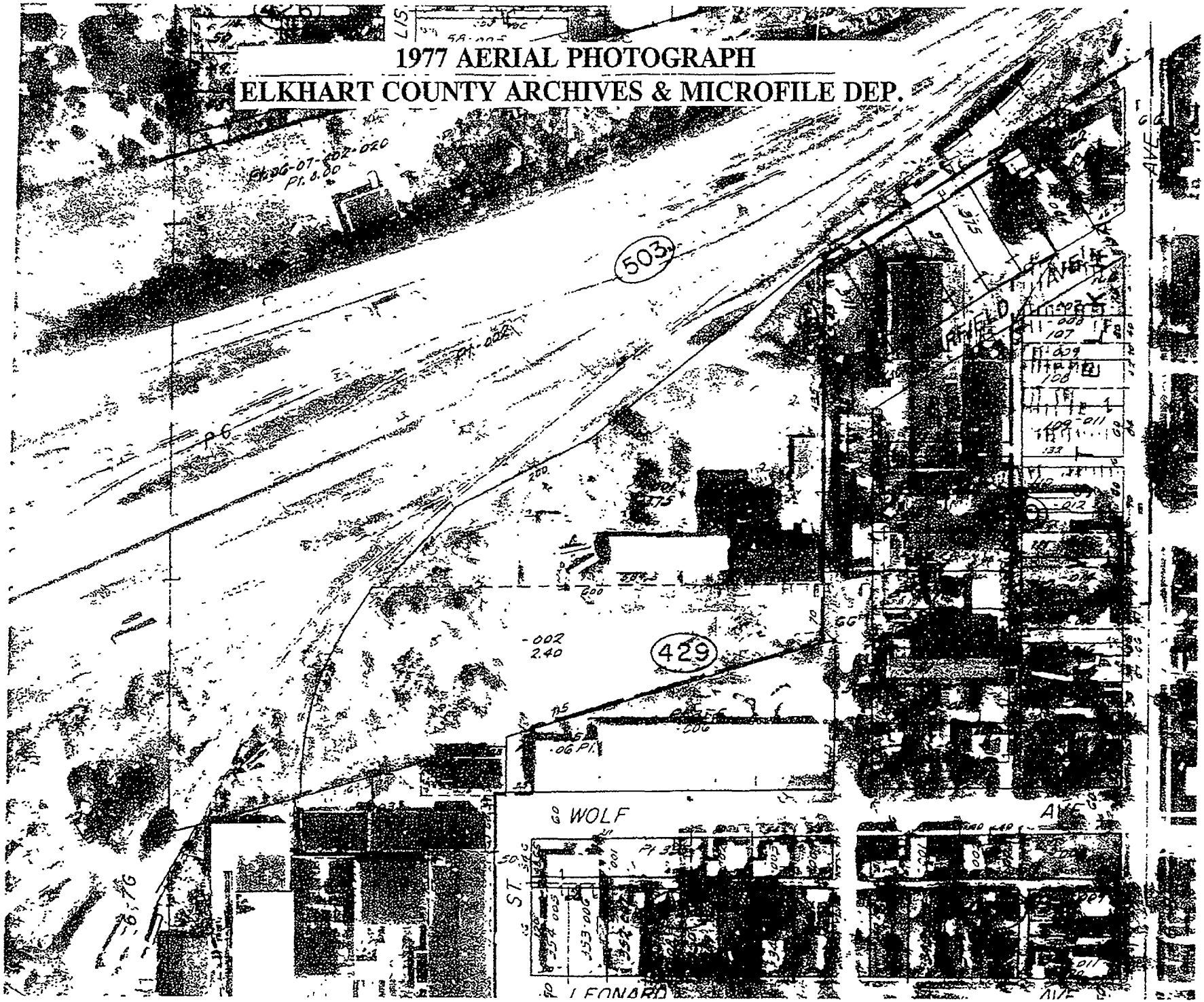
YEAR: 1957
SCALE: 1"= 750'
N

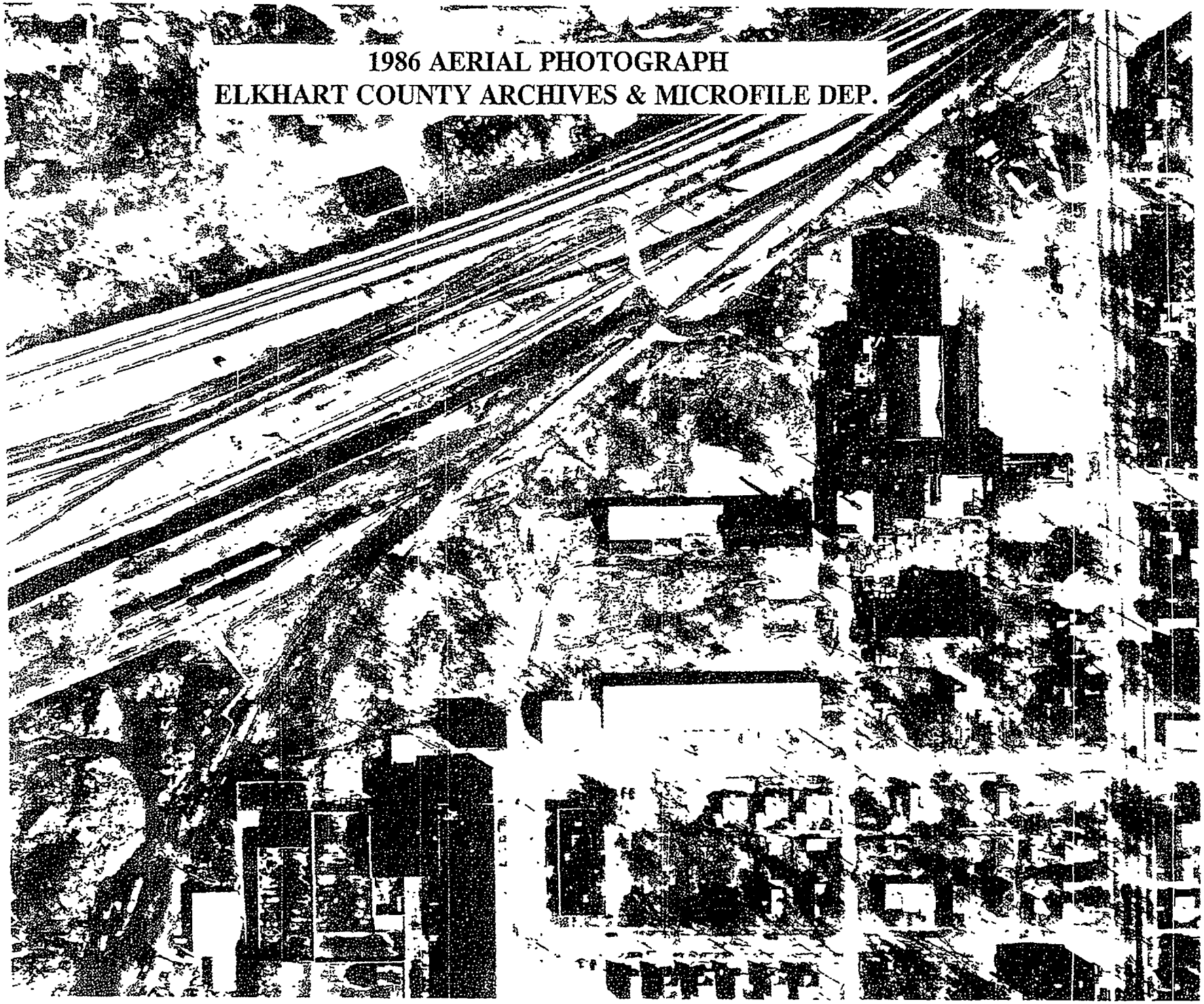

NQUIRY #: 1351823.5
YEAR: 1965
SCALE: 1"= 750'
N


IQUIRY #: 1351823.5
YEAR: 1973
SCALE: 1"= 750'
N


IQUIRY #: 1351823.5
YEAR: 1987
SCALE: 1"= 833'
N


NQUIRY #: 1351823.5
YEAR: 1992
SCALE: 1"= 833'
N


1977 AERIAL PHOTOGRAPH
ELKHART COUNTY ARCHIVES & MICROFILE DEP.
503
429
WOLF
ST
LEONARD
AVE


1986 AERIAL PHOTOGRAPH
ELKHART COUNTY ARCHIVES & MICROFILE DEP.

USGS

Appendix D
EDR Database Search Results

EDR™ Environmental
Data Resources Inc

The EDR Radius Map
with GeoCheck®

Sturgin Iron and Metal
1631 Oakland Avenue
Elkhart, IN 46516

Inquiry Number: 01351823.2r

January 31, 2005

The Standard in Environmental Risk Management Information

440 Wheelers Farms Road
Milford, Connecticut 06460

Nationwide Customer Service

Telephone: 1-800-352-0050
Fax: 1-800-231-6802
Internet: www.edrnet.com

FORM DPH

TABLE OF CONTENTS

Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

EXECUTIVE SUMMARY

A search of available environmental records was conducted by Environmental Data Resources, Inc. (EDR) The report meets the government records search requirements of ASTM Standard Practice for Environmental Site Assessments, E 1527-00. Search distances are per ASTM standard or custom distances requested by the user.

TARGET PROPERTY INFORMATION

ADDRESS

1631 OAKLAND AVENUE
ELKHART, IN 46516

COORDINATES

Latitude (North):	41.672600 - 41° 40' 21.4"
Longitude (West):	85.985300 - 85° 59' 7.1"
Universal Tranverse Mercator:	Zone 16
UTM X (Meters):	584467 2
UTM Y (Meters).	4613710.5
Elevation:	750 ft. above sea level

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property:	41085-F8 ELKHART, IN
Source:	USGS 7 5 min quad index

TARGET PROPERTY SEARCH RESULTS

The target property was not listed in any of the databases searched by EDR.

DATABASES WITH NO MAPPED SITES

No mapped sites were found in EDR's search of available ("reasonably ascertainable ") government records either on the target property or within the ASTM E 1527-00 search radius around the target property for the following databases:

FEDERAL ASTM STANDARD

Proposed NPL..... Proposed National Priority List Sites
RCRA-LQG..... Resource Conservation and Recovery Act Information
ERNS..... Emergency Response Notification System

STATE ASTM STANDARD

SHWS..... List of Hazardous Waste Response Sites Scored Using the Indiana Scoring Model
SWF/LF..... Permitted Solid Waste Facilities
VCP..... Voluntary Remediation Program Site List

FEDERAL ASTM SUPPLEMENTAL

CONSENT..... Superfund (CERCLA) Consent Decrees

EXECUTIVE SUMMARY

Delisted NPL	National Priority List Deletions
FINDS	Facility Index System/Facility Identification Initiative Program Summary Report
HMIRS	Hazardous Materials Information Reporting System
MLTS	Material Licensing Tracking System
NPL Liens	Federal Superfund Liens
PADS	PCB Activity Database System
DOD	Department of Defense Sites
INDIAN RESERV	Indian Reservations
ODI	Open Dump Inventory
UMTRA	Uranium Mill Tailings Sites
FUDS	Formerly Used Defense Sites
RAATS	RCRA Administrative Action Tracking System
TRIS	Toxic Chemical Release Inventory System
TSCA	Toxic Substances Control Act
SSTS	Section 7 Tracking Systems
FTTS INSP	FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)

STATE OR LOCAL ASTM SUPPLEMENTAL

IN Spills	Spills Incidents
BULK	Registered Bulk Fertilizer and Pesticide Storage Facilities
DRYCLEANERS	Drycleaner Facility Listing

EDR PROPRIETARY HISTORICAL DATABASES

Coal Gas	Former Manufactured Gas (Coal Gas) Sites

BROWNFIELDS DATABASES

Brownfields	Brownfields Site List
AUL	Sites with Restrictions
VCP	Voluntary Remediation Program Site List

SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were identified.

Elevations have been determined from the USGS Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified. Sites with an elevation equal to or higher than the target property have been differentiated below from sites with an elevation lower than the target property.
Page numbers and map identification numbers refer to the EDR Radius Map report where detailed data on individual sites can be reviewed.

Sites listed in ***bold italics*** are in multiple databases.

Unmappable (orphan) sites are not considered in the foregoing analysis.

FEDERAL ASTM STANDARD

EXECUTIVE SUMMARY

NPL: Also known as Superfund, the National Priority List database is a subset of CERCLIS and identifies over 1,200 sites for priority cleanup under the Superfund program. The source of this database is the U.S. EPA.

A review of the NPL list, as provided by EDR, and dated 10/12/2004 has revealed that there is 1 NPL site within approximately 1 mile of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
CONRAIL RAIL YARD (ELKHART)	*SR 33*	*0 - 1/8*	*0*	*6*

CERCLIS: The Comprehensive Environmental Response, Compensation and Liability Information System contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)
CERCLIS contains sites which are either proposed to or on the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL.

A review of the CERCLIS list, as provided by EDR, and dated 08/10/2004 has revealed that there is 1 CERCLIS site within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
CONRAIL RAIL YARD (ELKHART)	*SR 33*	*0 - 1/8*	*0*	*6*

CERCLIS-NFRAP: As of February 1995, CERCLIS sites designated "No Further Remedial Action Planned" (NFRAP) have been removed from CERCLIS. NFRAP sites may be sites where, following an initial investigation, no contamination was found, contamination was removed quickly without the need for the site to be placed on the NPL, or the contamination was not serious enough to require Federal Superfund Action or NPL consideration. EPA has removed approximately 25,000 NFRAP sites to lift the unintended barriers to the redevelopment of these properties and has archived them as historical records so EPA does not needlessly repeat the investigations in the future. This policy change is part of the EPA's Brownfields Redevelopment Program to help cities, states, private investors and affected citizens to promote economic redevelopment of unproductive urban sites.

A review of the CERC-NFRAP list, as provided by EDR, and dated 08/10/2004 has revealed that there is 1 CERC-NFRAP site within approximately 0.25 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
PATRICK METALS ELKHART	*1819 SOUTH 14TH STREET*	*1/8 - 1/4 SW*	*6*	*15*

CORRACTS: CORRACTS is a list of handlers with RCRA Corrective Action Activity. This report shows which nationally-defined corrective action core events have occurred for every handler that has had corrective action activity.

A review of the CORRACTS list, as provided by EDR, and dated 09/23/2004 has revealed that there are 2 CORRACTS sites within approximately 1 mile of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
PATRICK METALS ELKHART	*1819 SOUTH 14TH STREET*	*1/8 - 1/4 SW*	*6*	*15*
HERMASEAL CO	*1101 LAFAYETTE ST*	*1/8 - 1/4 NNE*	*A8*	*21*

EXECUTIVE SUMMARY

RCRAInfo: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. RCRAInfo replaces the data recording and reporting abilities of the Resource Conservation and Recovery Information System(RCRIS) The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month Large quantity generators generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month. Transporters are individuals or entities that move hazardous waste from the generator offsite to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.

A review of the RCRA-TSDF list, as provided by EDR, and dated 11/23/2004 has revealed that there is 1 RCRA-TSDF site within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
HERMASEAL CO	*1101 LAFAYETTE ST*	*1/8 - 1/4 NNE*	*A8*	*21*

RCRAInfo: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. RCRAInfo replaces the data recording and reporting abilities of the Resource Conservation and Recovery Information System(RCRIS). The database includes selective information on sites which generate, transport, store , treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month Large quantity generators generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month. Transporters are individuals or entities that move hazardous waste from the generator offsite to a facility that can recycle, treat, store, or dispose of the waste TSDFs treat, store, or dispose of the waste.

A review of the RCRA-SQG list, as provided by EDR, and dated 11/23/2004 has revealed that there are 7 RCRA-SQG sites within approximately 0.25 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
CONRAIL RAIL YARD (ELKHART)	*SR 33*	*0 - 1/8*	*0*	*6*
PATRICK METALS ELKHART	*1819 SOUTH 14TH STREET*	*1/8 - 1/4 SW*	*6*	*15*
HERMASEAL CO	*1101 LAFAYETTE ST*	*1/8 - 1/4 NNE*	*A8*	*21*
AMERICAN ELECTRONIC COMPONENTS	1101 LAFAYETTE ST	1/8 - 1/4 NNE	A9	25
HERMASEAL CO	1101 LAFAYETTE ST	1/8 - 1/4 NNE	A10	25
Lower Elevation	**Address**	**Dist / Dir**	**Map ID**	**Page**
ARA MFG CO	1317 INDIANA AVE	0 - 1/8 N	1	13
SELDOM REST BODY SHOP	*1317 W INDIANA AVE*	*1/8 - 1/4 NW*	*3*	*14*

STATE ASTM STANDARD

LUST: Lust List.

A review of the LUST list, as provided by EDR, and dated 08/04/2004 has revealed that there are 3

LUST sites within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
GANO PLYWOOD INC	*1334 W WOLF AVE*	*1/8 - 1/4 SW*	*2*	*13*
OAKLAND AUTO SERVICE	*1207 W LUSHER AVE*	*1/4 - 1/2 S*	*12*	*27*
Lower Elevation	**Address**	**Dist / Dir**	**Map ID**	**Page**
SMOKE EXPRESS #3	*1589 W FRANKLIN ST*	*1/4 - 1/2 WNW*	*11*	*26*

UST: The Underground Storage Tank database contains registered USTs USTs are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA). The data come from the Department of Environmental Management's Indiana Registered Underground Storage Tanks list.

A review of the UST list, as provided by EDR, and dated 08/04/2004 has revealed that there are 2 UST sites within approximately 0.25 miles of the target property

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
GANO PLYWOOD INC	*1334 W WOLF AVE*	*1/8 - 1/4 SW*	*2*	*13*
ELKHART OPERATING HEADQUARTERS	907 OAKLAND AVE	1/8 - 1/4 N	5	14

FEDERAL ASTM SUPPLEMENTAL

RODS: Record of Decision ROD documents mandate a permanent remedy at an NPL (Superfund) site containing technical and health information to aid the cleanup.

A review of the ROD list, as provided by EDR, has revealed that there is 1 ROD site within approximately 1 mile of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
CONRAIL RAIL YARD (ELKHART)	*SR 33*	*0 - 1/8*	*0*	*6*

Mines: Mines Master Index File. The source of this database is the Dept. of Labor, Mine Safety and Health Administration.

A review of the MINES list, as provided by EDR, and dated 09/13/2004 has revealed that there is 1 MINES site within approximately 0 25 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
FIDLER, INC.		1/8 - 1/4 SW	7	20

BROWNFIELDS DATABASES

US BROWNFIELDS: The EPA's listing of Brownfields properites addressed by Cooperative Agreement Recipients and Brownfields properties addressed by Targeted Brownfields Assessments

A review of the US BROWNFIELDS list, as provided by EDR, has revealed that there is 1 US BROWNFIELDS

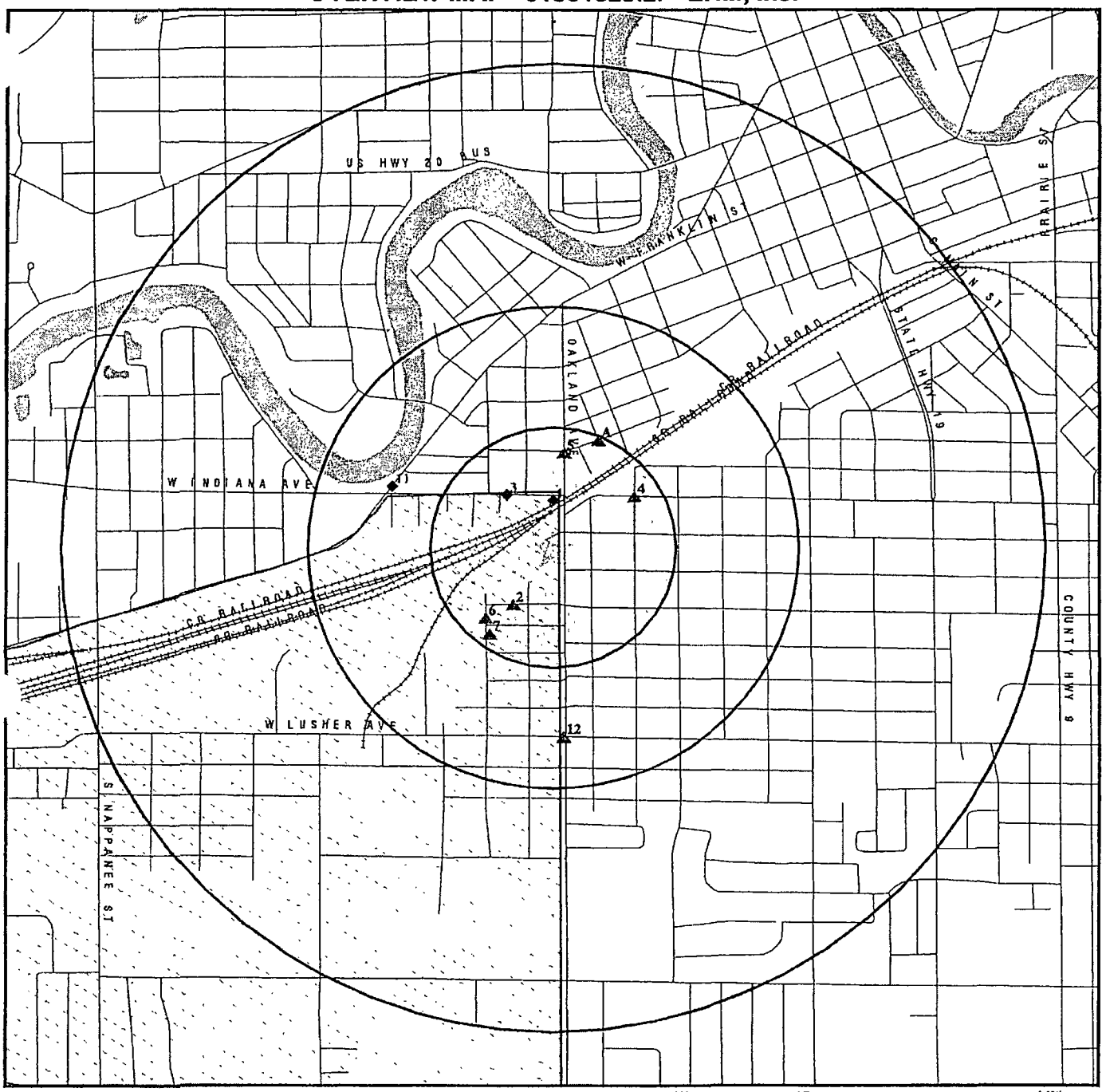
site within approximately 0 5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
BENHAM WEST BRAINFIELD SITE	10TH STREET/INDIANA AVE	1/8 - 1/4 ENE	4	14

Due to poor or inadequate address information, the following sites were not mapped:

Site Name	Database(s)
LUSHER AVENUE	SHWS
SYCAMORE STREET	SHWS
INDIANA AVENUE LANDFILL	Brownfields
BENHAM WEST BROWNFIELD SITE	Brownfields
WOODLAWN INDUSTRIAL DEVELOPMENT	CERCLIS, FINDS
WAGNER AVENUE SITE	CERC-NFRAP
ELKHART GASOLINE SPILL	CERC-NFRAP
WARNER & SONS INC C/D SITE	SWF/LF
ELKHART COUNTY LANDFILL	SWF/LF
SIX SPAN AMOCO	LUST
VARIOUS SITES	LUST, UST
SEE FAC ID 10907 DUP FILE 2	LUST
HUDSON BUILDING SUPPLY	IN Spills, UST
SIX SPAN AMOCO	UST
S AND S BODY SHOP	RCRA-SQG
INDIANA MICHIGAN POWER	RCRA-SQG, FINDS
CEISNICKI DUMP	ODI

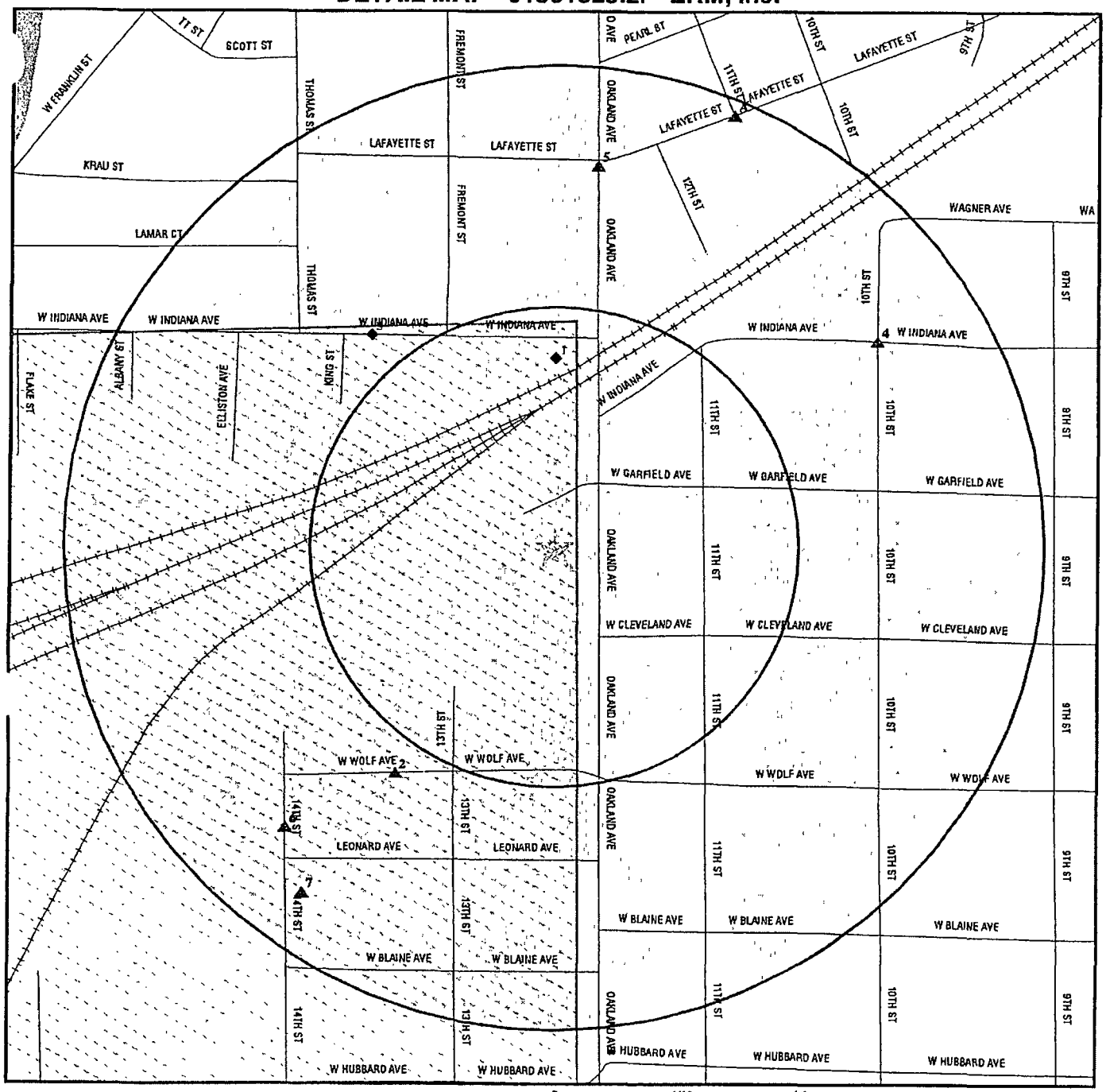
OVERVIEW MAP - 01351823.2r - ERM, Inc.



- Target Property
- Sites at elevations higher than or equal to the target property
- Sites at elevations lower than the target property
- Coal Gasification Sites
- National Priority List Sites
- Landfill Sites
- Dept. Defense Sites
- Indian Reservations BIA
- Oil & Gas pipelines
- 100-year flood zone
- 500-year flood zone
- Federal Wetlands

TARGET PROPERTY:	Sturgin Iron and Metal	CUSTOMER:	ERM, Inc.
ADDRESS:	1631 Oakland Avenue	CONTACT:	Dan Ruslecki
CITY/STATE/ZIP:	Elkhart IN 46516	INQUIRY #:	01351823.2r
LAT/LONG:	41.6726 / 85.9853	DATE:	January 31, 2005 6:41 pm

DETAIL MAP - 01351823.2r - ERM, Inc.



0 1/16 1/8 1/4 Miles

- Target Property
- Sites at elevations higher than or equal to the target property
- Sites at elevations lower than the target property
- Coal Gasification Sites
- Sensitive Receptors
- National Priority List Sites
- Landfill Sites
- Dept. Defense Sites
- Indian Reservations BIA
- Oil & Gas pipelines
- 100-year flood zone
- 500-year flood zone
- Federal Wetlands

TARGET PROPERTY:	Sturgin Iron and Metal	CUSTOMER:	ERM, Inc.
ADDRESS:	1631 Oakland Avenue	CONTACT:	Dan Rusiecki
CITY/STATE/ZIP:	Elkhart IN 46516	INQUIRY #:	01351823.2r
LAT/LONG:	41.6726 / 85.9853	DATE:	January 31, 2005 6:42 pm

MAP FINDINGS SUMMARY

Database	Target Property	Search Distance (Miles)	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
FEDERAL ASTM STANDARD								
NPL		1.000	1	0	0	0	NR	1
Proposed NPL		1.000	0	0	0	0	NR	0
CERCLIS		0.500	1	0	0	NR	NR	1
CERC-NFRAP		0.250	0	1	NR	NR	NR	1
CORRACTS		1.000	0	2	0	0	NR	2
RCRA TSD		0.500	0	1	0	NR	NR	1
RCRA Lg. Quan Gen.		0.250	0	0	NR	NR	NR	0
RCRA Sm. Quan. Gen.		0.250	2	5	NR	NR	NR	7
ERNS		TP	NR	NR	NR	NR	NR	0
STATE ASTM STANDARD								
State Haz. Waste		1.000	0	0	0	0	NR	0
State Landfill		0.500	0	0	0	NR	NR	0
LUST		0.500	0	1	2	NR	NR	3
UST		0.250	0	2	NR	NR	NR	2
VCP		0.500	0	0	0	NR	NR	0
FEDERAL ASTM SUPPLEMENTAL								
CONSENT		1.000	0	0	0	0	NR	0
ROD		1.000	1	0	0	0	NR	1
Delisted NPL		1.000	0	0	0	0	NR	0
FINDS		TP	NR	NR	NR	NR	NR	0
HMIRS		TP	NR	NR	NR	NR	NR	0
MLTS		TP	NR	NR	NR	NR	NR	0
MINES		0.250	0	1	NR	NR	NR	1
NPL Liens		TP	NR	NR	NR	NR	NR	0
PADS		TP	NR	NR	NR	NR	NR	0
DOD		1.000	0	0	0	0	NR	0
INDIAN RESERV		1.000	0	0	0	0	NR	0
ODI		0.500	0	0	0	NR	NR	0
UMTRA		0.500	0	0	0	NR	NR	0
FUDS		1.000	0	0	0	0	NR	0
RAATS		TP	NR	NR	NR	NR	NR	0
TRIS		TP	NR	NR	NR	NR	NR	0
TSCA		TP	NR	NR	NR	NR	NR	0
SSTS		TP	NR	NR	NR	NR	NR	0
FTTS		TP	NR	NR	NR	NR	NR	0
STATE OR LOCAL ASTM SUPPLEMENTAL								
IN Spills		TP	NR	NR	NR	NR	NR	0
BULK		TP	NR	NR	NR	NR	NR	0
DRYCLEANERS		0.250	0	0	NR	NR	NR	0
EDR PROPRIETARY HISTORICAL DATABASES								
Coal Gas		1.000	0	0	0	0	NR	0

MAP FINDINGS SUMMARY

Database	Target Property	Search Distance (Miles)	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
BROWNFIELDS DATABASES								
US BROWNFIELDS		0.500	0	1	0	NR	NR	1
Brownfields		0.500	0	0	0	NR	NR	0
AUL		0.500	0	0	0	NR	NR	0
VCP		0.500	0	0	0	NR	NR	0

NOTES:

AQUIFLOW - see EDR Physical Setting Source Addendum

TP = Target Property

NR = Not Requested at this Search Distance

Sites may be listed in more than one database

Coal Gas Site Search: No site was found in a search of Real Property Scan's ENVIROHAZ database.

NPL **CONRAIL RAIL YARD (ELKHART)** **CERCLIS 1000353185**
Region **SR 33** **RCRA-SQG IND000715490**
ELKHART, IN 46514 **FINDS**
< 1/8 **IN Spills**
1 ft. **NPL**
ROD

CERCLIS Classification Data:

Site incident category	Not reported	Federal Facility:	Not a Federal Facility
Non NPL Status:	Not reported		
Ownership Status	Private	NPL Status:	Currently on the Final NPL
Contact:	BRAD BRADLEY	Contact Tel	(312) 886-4742
Contact Title:	Not reported		
Contact	LAWRENCE SCHMITT	Contact Tel	(312) 353-6565
Contact Title	Not reported		

Site Description: The railyard began operations in 1956 as part of the New York Central Railroad, and continued operations as a subsidiary of the Penn Central Transportation Company until 1976 From 1961 to 1968, numerous citizen complaints regarding oil discharges from the railyard to the St Joseph River were filed with state and local authorities Between 1966 and 1969 a tank car containing carbon tetrachloride collided with another car during humping operations at the railyard, causing the release of appro ximately 16,000 gallons of carbon tetrachloride. In 1976 operations at the railyard were transferred to the Consolidated Rail Corporation (Conrail) From 1976 to the present, spills and releases of oil, diesel fuel, hydrochloric acid, caustic soda, and various petroleum-related substances have occurred there. Track-cleaning substances (unknown chemical composition) and engine degreasers were also used and disposed of at the railyard. In 1986, a resident reported to EPA that his residential w ell contained elevated levels of volatile organic compounds Later in 1986, the EPA/Technical Assistance Team (EPA/TAT) performed sample analysis indicating that several residential wells contained trichloroethylene (TCE), with concentrations as hig h as 4,870 ppb, and carbon tetrachloride (CCl4), with concentations as high as 6,680 ppb. Bottled water was provided to residents with affected wells, and many residents installed carbon filters after being connected to the water-main extension from the city The Indiana Department of Environmental Management assisted in the operation and maintenance of these filters until 1992. IDEM also periodically sampled the wells to monitor migration. EPA/TAT later discovered soil contamination EPA s ent a notice to Conrail in 1988, offering them the opportunity to undertake the RI/FS. Conrail expressed a willingness to undertake only part of the RI/FS, so EPA determined that Conrail had not presented a "good faith" offer to conduct the entire investigation. Later in 1988, EPA entered into a contract to have the RI/FS conducted. The RI was conducted in three phases, the first of which was completed in January 1990 and consisted of a soil gas survey, soil sampling, and ground water sampl ing for TCE and CCl4. The second phase, summarized in 1992, preliminarily identified potential sources contributing to contamination The third phase defined the path of ground water contamination plumes. An interim ROD was signed in June 1991 bas ed on the phase I and II RI results. EPA issued a Unilateral Administrative Order for Remedial Design and Remedial Action requiring Conrail and Penn Central to perform

CONRAIL RAIL YARD (ELKHART) (Continued) **1000353185**

remedial actions Only Conrail has complied. The Interim Remedial Action consi sts of institutional controls, inluding deed restrictions, a monitoring program for ground water and air, ground water extraction, collection, treatment, and discharge; fence installation; provision of an alternate water supply. The Interim Remedial Action was approved for implementation in 1994, and should begin before the end of 1994.
The 675-acre Conrail Railyard site is adjacent to and within the southwestern city limits of Elkhart, Indiana It is bounded to the north by US33 (Franklin Street), on the east by State Route 19, to the south by Mishawaka Road, and to the west by S tate Route 219. The railyard is an electronically controlled hump yard which serves as a classification distribution yard for freight cars The yard, which began operations In 1956, processes about 74 trains per day via 15 receiving and 14 departing tracks Car repair, engine cleaning, and diesel refueling facilities are also located on the yard. The actual study area includes the railyard and encompasses about 2,500 acres with generally flat topography. The study area is bounded on the nort h by the St. Joseph River, on the west by Baugo Bay, on the east by Oakland Ave, and on the south by the southern border of the Conrail railyard Several light industrial properties are within the study area to the north and northwest of the railyar d and along the eastern and southern portions of the study area. Several residential areas, with the total population of 3,500, are located within the study area, about 1.5 miles away from the site. About 3,000 people use private residential wells for their water supply. Crawford ditch originates at the site and flows intermittently to the St Joseph River. Floodplains and wetland areas exist along both the St Joseph River and Baugo Bay The rail yard began operations in 1956 as part of t he New York Central Railroad, and continued as a subsidiary of the Penn Central Transportation Company (now known as American Premier Underwriters) until 1976. From 1962 to 1968, numerous citizen complaints regarding oil discharges from the rail yar d to the St Joseph River via the Crawford Ditch were filed with state and local authorities. In 1976, operations at the rail yard were transferred to the Consolidated Rail Yard Corporation (Conrail) From 1976 to the present, spills and releas
es of oil, diesel fuel, hydrochloric acid, caustic soda, and various petroleum-related substances have occurred there Reports also indicate that a track-cleaning substance (the chemical composition of which is unknown) and engine degreasers were u sed and disposed of at the rail yard The Conrail Site is partially located within the southwestern city limits of Elkhart, Indiana. The remainder of the Site extends into St Joseph County to the west. The Site encompasses the 675-acre Elkhart Ya rd of Conrail (now operated by Norfolk Southern), and the area to the north to the St Joseph River, most of which is residential. Areas of groundwater contamination extend from within the Conrail Rail Yard In two directions, north and northwest, in to residential areas, designated as the County Road 1 area, the LaRue Street area, the Vistula Avenue area, and the Charles Avenue area (see Figure 1). Contaminants detected in samples collected from private wells in these areas include carbon tetra chloride (CCl4), trichloroethylene (TCE), and other volatile organic compounds (VOC's) Based upon sampling performed by EPA representatives in 1986, bottled water was provided to residents whose wells were affected by the contamination Either car bon filters or water main connections were later installed in residences to ensure safe drinking water.

CONRAIL RAIL YARD (ELKHART) (Continued) **1000353185**

CERCLIS Assessment History.

Assessment:	DISCOVERY	Completed.	07/01/1983
Assessment:	PRELIMINARY ASSESSMENT	Completed:	02/05/1987
Assessment.	PRELIMINARY ASSESSMENT	Completed.	09/11/1987
Assessment:	NPL RP SEARCH	Completed:	12/30/1987
Assessment:	PROPOSAL TO NPL	Completed:	06/24/1988
Assessment	HRS PACKAGE	Completed:	06/24/1988
Assessment:	SITE INSPECTION	Completed:	06/24/1988
Assessment:	RI/FS NEGOTIATIONS	Completed:	09/29/1988
Assessment:	REMOVAL ASSESSMENT	Completed	07/25/1990
Assessment:	FINAL LISTING ON NPL	Completed	08/30/1990
Assessment.	REMOVAL	Completed:	05/12/1991
Assessment:	REMOVAL ASSESSMENT	Completed	06/25/1991
Assessment:	RECORD OF DECISION	Completed:	06/28/1991
Assessment:	COMBINED RI/FS	Completed	06/28/1991
Assessment	RD/RA NEGOTIATIONS	Completed:	07/07/1992
Assessment:	UNILATERAL ADMIN ORDER	Completed	07/07/1992
Assessment	REMOVAL ASSESSMENT	Completed	05/27/1993
Assessment:	RISK/HEALTH ASSESSMENT	Completed:	03/31/1994
Assessment.	ECOLOGICAL RISK ASSESSMENT	Completed	03/31/1994
Assessment:	PRP RD	Completed:	06/02/1994
Assessment:	RECORD OF DECISION	Completed:	09/09/1994
Assessment:	COMBINED RI/FS	Completed:	09/09/1994
Assessment:	UNILATERAL ADMIN ORDER	Completed:	05/15/1995
Assessment.	Lodged By DOJ	Completed.	08/02/1996
Assessment:	CONSENT DECREE	Completed:	03/18/1997
Assessment:	PRP RA	Completed:	06/16/1997
Assessment:	Lodged By DOJ	Completed:	08/12/1997
Assessment:	CONSENT DECREE	Completed.	11/10/1997
Assessment	FIVE YEAR REVIEW	Completed.	09/23/1999
Assessment:	ROD Amendment	Completed	09/27/2000
Assessment	COMMUNITY INVOLVEMENT	Completed:	12/31/2001
Assessment.	PRP RD	Completed.	05/29/2003
Assessment	TECHNICAL ASSISTANCE GRANT	Completed	12/31/2003

CERCLIS Site Status:
Not reported

CERCLIS Alias Name(s):
COUNTY RD 1
COUNTY RD 1
COUNTY RD 1
CONRAIL RAILYARD ELKHART
CONRAIL RAILYARD ELKHART
CONRAIL RAILYARD ELKHART
CONRAIL RAIL YARD (ELKHART)

NPL:

EPA ID.	IND000715490
Region:	05
Federal:	General
Final Date.	08/30/1990

NPL SUMMARY:

Summary : Conditions at proposal June 24, 1988): Consolidated Rail Corp Conrail) has operated a rail yard on County Road 1 at the southwestern edge of Elkhart, Elkhart County, Indiana, since 1976. Previously, the 675 acre property had been a rail yard fo
r New York Central Railroad 1956 68) and Penn Central Railroad 1968 76).The Indiana Department of Environmental Management has documented numerous spills at

CONRAIL RAIL YARD (ELKHART) (Continued) 1000353185

the rail yard since 1976 In June 1986, EPA s emergency removal program was asked by the El
khart County Health Department to confirm analyses indicating that local wells were contaminated with carbon tetrachloride and trichloroethylene TCE). EPA s investigation identified five areas covering about 5 acres requiring further study: the d
iesel shop, the area surrounding oil and water tanks, several areas where wastes may have been buried, the shop where car tanks were cleaned, and the Crawford Ditch, which flows into the St. Joseph River. Analyses indicate that soils in some of the
se areas contain carbon tetrachloride, and wells downgradient of the rail yard contain carbon tetrachloride, TCE, tetrachloroethylene, chloroform, and dichloroethane EPA installed activated carbon units at residences with contaminated wells. EPA
analyses indicate a plume of contaminated ground water that is 1 5 2 miles long and empties into the St Joseph River An estimated 55,000 people obtain drinking water from Elkhart municipal wells and private wells within 3 miles of the site Status
August 30, 1990) In June 1988, EPA issued a special notice letter offering Conrail the opportunity to conduct a remedial investigation/feasibility study RI/FS) to determine the type and extent of contamination at the site and identify alternat
ives for remedial action. In September 1988, EPA notified Conrail its response could not be considered an acceptable good faith offer. Accordingly, EPA is conducting the RI/FS, field work began in August 1989. Initial data confirmed the existen
ce of two plumes of contaminated ground water EPA is reviewing the data to assess the need for additional field work and interim remedial measures.Field investigations by a Conrail contractor found TCE and carbon tetrachloride in soil and ground w
ater within the rail yard

NPL Contaminant.

NPL Status·	Final
Substance Id	A030
Case Num:	540-59-0
Substance ·	DICHLOROETHENE, NOS
Pathway :	NOT INDICATED
GW Scoring :	Not reported
SW Sconng .	Not reported
Air Scoring:	Not reported
Soil Sconng	Not reported
DC Scoring·	Not reported
FE Scoring.	Not reported

NPL Status.	Final
Substance Id:	C321
Case Num	Not reported
Substance :	TRICHLOROETHANE, NOS
Pathway :	NOT INDICATED
GW Scoring :	Not reported
SW Scoring :	Not reported
Air Scoring:	Not reported
Soil Scoring:	Not reported
DC Sconng·	Not reported
FE Scoring:	Not reported

NPL Status·	Final
Substance Id.	U044

CONRAIL RAIL YARD (ELKHART) (Continued) **1000353185**

Case Num:	67-66-3
Substance	CHLOROFORM
Pathway :	The Ground water migration route , or pathway.
GW Scoring	Observed Release & Toxicity
SW Scoring .	Not reported
Air Scoring	Not reported
Soil Scoring	Not reported
DC Scoring:	Not reported
FE Scoring.	Not reported
NPL Status.	Final
Substance Id:	U210
Case Num:	79-34-5
Substance :	TETRACHLOROETHENE
Pathway	The Ground water migration route , or pathway
GW Scoring :	Observed Release
SW Scoring :	Not reported
Air Scoring.	Not reported
Soil Scoring:	Not reported
DC Scoring.	Not reported
FE Scoring:	Not reported
NPL Status:	Final
Substance Id.	U211
Case Num:	56-23-5
Substance	CARBON TETRACHLORIDE
Pathway :	The Ground water migration route , or pathway.
GW Scoring	Observed Release & Toxicity
SW Scoring .	Not reported
Air Scoring:	Not reported
Soil Scoring:	Not reported
DC Scoring:	Not reported
FE Scoring	Not reported
NPL Status	Final
Substance Id.	U228
Case Num:	79-01-6
Substance :	TRICHLOROETHYLENE (TCE), 1,1,2-
Pathway	The Ground water migration route , or pathway
GW Scoring :	Observed Release
SW Scoring :	Not reported
Air Scoring	Not reported
Soil Scoring:	Not reported
DC Scoring	Not reported
FE Scoring:	Not reported

NPL Site.

CERCLIS Id:	IND000715490
Site City:	Elkhart
Site State	IN
NPL Status:	Final
Status Date:	08/30/90
Federal Site:	Not reported
HRS Score:	42.24
GW Score:	73.08
SW Score:	0 00
Air Score.	0 00
Soil Score:	0.00
DC Score	0.00

CONRAIL RAIL YARD (ELKHART) (Continued) **1000353185**

FE Score: 0 0

NPL Char:

NPL Status. Final
Category Description: DEPTH TO AQUIFER
Category Value 16

NPL Status: Final
Category Descnption. DISTANCE TO THE NEAREST POPULATION
Category Value 0

NPL Status: Final
Category Description OBSERVED RELEASE-Ground Water
Category Value. Not reported

NPL Status Final
Category Description: OTHER GROUND WATER USE-Industrial Process Cooling
Category Value: Not reported

NPL Status: Final
Category Description PERMIT-None
Category Value: Not reported

NPL Status Final
Category Description: PHYSICAL STATE-Liquid
Category Value Not reported

NPL Status. Final
Category Description: SITE ACTIVITY WASTE SOURCE-Ground Water Plume
Category Value: Not reported

NPL Status: Final
Category Description: SITE ACTIVITY WASTE SOURCE-Industry Railroad
Category Value: Not reported

NPL Status: Final
Category Description: SURFACE WATER ADJACENT TO SITE-Drain Ditch
Category Value: Not reported

NPL Status: Final
Category Description: SURFACE WATER ADJACENT TO SITE-River
Category Value Not reported

NPL SITE STATUS
NPL Status: Final
Proposed Date 06/24/1988
Final Date: 08/30/1990
Deleted Date: Not reported

ROD:
Full-text of USEPA Record of Decision(s) is available from EDR

CONRAIL RAIL YARD (ELKHART) (Continued) **1000353185**

RCRAInfo·
Owner: NAME NOT REPORTED
(312) 555-1212
EPA ID IND000715490
Contact· KEITH R MILLER
(540) 981-4154
Classification: Conditionally Exempt Small Quantity Generator
TSDF Activities. Not reported

BIENNIAL REPORTS.
Last Biennial Reporting Year: 2001

Waste	Quantity (Lbs)
D008	2500 00

Violation Status. Violations exist

Regulation Violated·	279 22c
Area of Violation:	INUOA
Date Violation Determined·	09/28/1998
Actual Date Achieved Compliance	12/23/1998
Enforcement Action	WRITTEN INFORMAL
Enforcement Action Date·	11/18/1998
Penalty Type:	Not reported

There are 1 violation record(s) reported at this site:

Evaluation	Area of Violation	Date of Compliance
Compliance Evaluation Inspection	INUOA	19981223

FINDS
Other Pertinent Environmental Activity Identified at Site:
Aerometric Information Retneval System/AIRS Facility Subsystem
Comprehensive Environmental Response, Compensation and Liability Information System
Integrated Compliance Information
Permit Compliance System
Resource Conservation and Recovery Act Information system

SPILL.

Facility ID.	198906002		
Incident Date·	05/31/1989	Report Date	06/01/1989
Spill Type·	Spill		
Spill Source	Trans - RR		
Contained:	No		
Water Affected.	Elkhart	Area Affected	Miles
Fish Killed:	0	Wtr Supply Affctd·	No
Enforcement.	NONE		
Spilled Amount.	0	Units:	Gallons
Recovered Amnt:	0	Units.	Unknown Units
Material:	Diesel Fuel		
Cleanup Duration·	0		

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
1 North < 1/8 520 ft. Relative: Lower Actual: 748 ft.	**ARA MFG CO** **1317 INDIANA AVE** **ELKHART, IN 46515** RCRAInfo: Owner: HAKES PHILIP M (312) 555-1212 EPA ID: IND981779473 Contact: Not reported Classification: Small Quantity Generator TSDF Activities: Not reported Violation Status: No violations found	RCRA-SQG	1000124161 IND981779473
2 SW 1/8-1/4 754 ft. Relative: Higher Actual: 754 ft.	**GANO PLYWOOD INC** **1334 W WOLF AVE** **ELKHART, IN 46516** LUST: Facility ID: 2305 Owner Name: Gano Plywood Incident Number: 199008582 Priority: Low Affected Area: Soil Description: NFA-94 guidance UST: Facility ID: 2305 Tank Number: 1 Tank Status: PERMANENTLY OUT OF SERVICE Install Date: / / Closure Date: Not reported Owner Id: 1693 Company Name: Gano Plywood Inc Mailing Address: 1334 W Wolf Ave Elkhart, IN 46516 Closure Status: Open Facility ID: 2305 Tank Number: 2 Tank Status: PERMANENTLY OUT OF SERVICE Install Date: / / Closure Date: Not reported Owner Id: 1693 Company Name: Gano Plywood Inc Mailing Address: 1334 W Wolf Ave Elkhart, IN 46516 Closure Status: Open	LUST UST	1000762618 N/A

Map ID / Direction / Distance / Distance (ft) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
3 NW 1/8-1/4 767 ft. Relative: Lower Actual: 747 ft.	**SELDOM REST BODY SHOP** **1317 W INDIANA AVE** **ELKHART, IN 46516**	RCRA-SQG FINDS	1000464300 IND025012329

RCRAInfo
Owner: NA
(312) 555-1212
EPA ID: IND025012329
Contact: Not reported
Classification: Small Quantity Generator
TSDF Activities. Not reported

Violation Status. Violations exist

Regulation Violated:	Not reported
Area of Violation:	GENERATOR-ALL REQUIREMENTS (OVERSIGHT)
Date Violation Determined	07/25/1986
Actual Date Achieved Compliance	12/07/1988
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	07/25/1986
Penalty Type:	Not reported

There are 1 violation record(s) reported at this site:

Evaluation	Area of Violation	Date of Compliance
Other Evaluation	GENERATOR-ALL REQUIREMENTS (OVERSIGHT)	19881207

FINDS:
Other Pertinent Environmental Activity Identified at Site:
Indiana Facility Registry System
Resource Conservation and Recovery Act Information system

Map ID / Direction / Distance / Distance (ft) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
4 ENE 1/8-1/4 1037 ft. Relative: Higher Actual: 755 ft.	**BENHAM WEST BRAINFIELD SITE** **10TH STREET/INDIANA AVE** **ELKHART, IN 46516**	US BROWNFIELDS	1007265918 N/A

US BROWNFIELDS:

Pilot Name.	Not reported
EPA Region:	05
EPA ID	INB000508971
Site ID:	0508971
Ownership Type:	Not reported
Action.	TARGETED BROWNFIELDS ASSESSMENTS
Action Complete Date:	07/03/2003

Map ID / Direction / Distance / Distance (ft) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
5 North 1/8-1/4 1053 ft. Relative: Equal Actual: 750 ft.	**ELKHART OPERATING HEADQUARTERS** **907 OAKLAND AVE** **ELKHART, IN 46515**	UST	1000754191 N/A

UST:

Facility ID:	6087
Tank Number:	1
Tank Status:	CURRENTLY IN USE
Install Date.	/ /
Closure Date:	Not reported
Owner Id:	4502
Company Name.	Northern In Public Service- Sidney Rice

ELKHART OPERATING HEADQUARTERS (Continued) 1000754191

Mailing Address: 801 E 86th Ave
Merrillville, IN 46410
Closure Status: Open

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6 SW 1/8-1/4 1056 ft.
PATRICK METALS ELKHART
1819 SOUTH 14TH STREET
ELKHART, IN 46515

RCRA-SQG 1000892729
FINDS IND005470521
CORRACTS
CERC-NFRAP

Relative: Higher

Actual: 754 ft.

CERCLIS-NFRAP Classification Data:
Site Incident Category: Not reported
Non NPL Code. DR
Ownership Status: Unknown
Federal Facility. Not a Federal Facility
NPL Status: Not on the NPL
CERCLIS-NFRAP Assessment History
Assessment: DISCOVERY Completed: 01/21/1992
Assessment: PRELIMINARY ASSESSMENT Completed 03/27/1992
Assessment: ARCHIVE SITE Completed: 12/13/1995
CERCLIS-NFRAP Alias Name(s):
ILC PRODUCTS CO INC ALUMINUM E
ILC PRODUCTS COMPANY, INC.

CORRACTS Data:

EPA Id: IND005470521
Region: 5
Area Name: ENTIRE FACILITY
Actual Date: 03/09/1992
Corrective Action: CA050 - RFA Completed
2002 NAICS Title Coating, Engraving, Heat Treating, and Allied Activities

EPA Id: IND005470521
Region: 5
Area Name: ENTIRE FACILITY
Actual Date: 02/25/1992
Corrective Action. CA225YE - Stabilization Measures Evaluation, This facility ,is amenable to stabilization activity based on the, status of corrective action work at the facility, technical factors, the degree of risk, timing considerations and administrative considerations
2002 NAICS Title Coating, Engraving, Heat Treating, and Allied Activities

EPA Id: IND005470521
Region: 5
Area Name: ENTIRE FACILITY
Actual Date 03/31/1992
Corrective Action: CA075LO - CA Prioritization, Facility or area was assigned a low corrective action priority
2002 NAICS Title. Coating, Engraving, Heat Treating, and Allied Activities

RCRAInfo Corrective Action Summary:
Event: CA Prioritization, Facility or area was assigned a low corrective action priority
Event Date: 03/31/1992

PATRICK METALS ELKHART (Continued) **1000892729**

Event. RFA Completed
Event Date 03/09/1992

Event: Stabilization Measures Evaluation,This facility is amenable to stabilization activity based on the status of corrective action work at the facility, technical factors, the degree of nsk, timing considerations and administrative considerations.
Event Date: 02/25/1992

RCRAInfo:
Owner: ILC PRODUCTS CO INC
(219) 293-6565
EPA ID: IND005470521

Contact: DAVID THOMPSON
(219) 293-6565

Classification. Small Quantity Generator
TSDF Activities Not reported

BIENNIAL REPORTS
Last Biennial Reporting Year. 2001

Waste	Quantity (Lbs)	Waste	Quantity (Lbs)
D001	34833.00	F003	62621.00
F005	62621 00		

Violation Status: Violations exist

Regulation Violated: 262 34a3
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined: 09/27/2000
Actual Date Achieved Compliance Not reported

Regulation Violated: 262 34/265 173a
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined: 09/27/2000
Actual Date Achieved Compliance: Not reported

Regulation Violated: 262.34c1ii
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined. 09/27/2000
Actual Date Achieved Compliance: Not reported

Regulation Violated 262.34a2
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined: 09/27/2000
Actual Date Achieved Compliance: Not reported

Regulation Violated: Not reported
Area of Violation GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined 09/18/1997
Actual Date Achieved Compliance 01/30/1998

Regulation Violated. Not reported
Area of Violation: INUWR
Date Violation Determined: 09/18/1997
Actual Date Achieved Compliance 01/30/1998

Regulation Violated: Not reported
Area of Violation: TSD-GENERAL STANDARDS
Date Violation Determined 06/11/1993
Actual Date Achieved Compliance: 03/25/1998

PATRICK METALS ELKHART (Continued) **1000892729**

Regulation Violated:	Not reported
Area of Violation:	GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined	06/11/1993
Actual Date Achieved Compliance	03/25/1998
Regulation Violated	Not reported
Area of Violation:	GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined:	06/11/1993
Actual Date Achieved Compliance:	03/25/1998
Regulation Violated:	Not reported
Area of Violation.	TSD-LAND BAN REQUIREMENTS
Date Violation Determined	06/11/1993
Actual Date Achieved Compliance:	03/25/1998
Regulation Violated:	Not reported
Area of Violation.	GENERATOR-GENERAL REQUIREMENTS
Date Violation Determined:	06/11/1993
Actual Date Achieved Compliance.	03/25/1998
Regulation Violated:	Not reported
Area of Violation:	GENERATOR-MANIFEST REQUIREMENTS
Date Violation Determined.	06/11/1993
Actual Date Achieved Compliance:	03/25/1998
Regulation Violated:	Not reported
Area of Violation:	GENERATOR-GENERAL REQUIREMENTS
Date Violation Determined:	06/11/1993
Actual Date Achieved Compliance:	03/25/1998
Regulation Violated:	Not reported
Area of Violation.	GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined:	06/11/1993
Actual Date Achieved Compliance	03/25/1998
Regulation Violated:	Not reported
Area of Violation:	GENERATOR-OTHER REQUIREMENTS
Date Violation Determined	06/11/1993
Actual Date Achieved Compliance	03/25/1998
Regulation Violated.	Not reported
Area of Violation:	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS
Date Violation Determined:	09/23/1992
Actual Date Achieved Compliance.	03/25/1998
Regulation Violated:	Not reported
Area of Violation:	GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined	02/14/1992
Actual Date Achieved Compliance:	03/25/1998
Regulation Violated:	Not reported
Area of Violation:	TSD-CLOSURE/POST-CLOSURE REQUIREMENTS
Date Violation Determined:	02/14/1992
Actual Date Achieved Compliance:	03/25/1998
Regulation Violated:	Not reported
Area of Violation:	GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined	02/14/1992
Actual Date Achieved Compliance:	03/25/1998
Regulation Violated:	Not reported
Area of Violation:	GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined:	02/14/1992

PATRICK METALS ELKHART (Continued) **1000892729**

Actual Date Achieved Compliance	03/25/1998
Regulation Violated	Not reported
Area of Violation:	TSD-CLOSURE/POST-CLOSURE REQUIREMENTS
Date Violation Determined:	02/14/1992
Actual Date Achieved Compliance.	03/25/1998
Regulation Violated:	Not reported
Area of Violation:	GENERATOR-OTHER REQUIREMENTS
Date Violation Determined.	02/14/1992
Actual Date Achieved Compliance	03/25/1998
Regulation Violated	Not reported
Area of Violation:	GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined:	09/04/1990
Actual Date Achieved Compliance:	Not reported
Regulation Violated	Not reported
Area of Violation:	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS
Date Violation Determined.	09/04/1990
Actual Date Achieved Compliance:	Not reported
Regulation Violated:	Not reported
Area of Violation	TSD-CLOSURE/POST-CLOSURE REQUIREMENTS
Date Violation Determined	09/04/1990
Actual Date Achieved Compliance	Not reported
Regulation Violated.	Not reported
Area of Violation.	GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined:	09/04/1990
Actual Date Achieved Compliance:	Not reported
Regulation Violated:	Not reported
Area of Violation:	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS
Date Violation Determined	10/29/1987
Actual Date Achieved Compliance:	03/25/1998
Enforcement Action:	INITIAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date	08/18/1988
Penalty Type	Final Monetary Penalty
Enforcement Action:	FINAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date	09/30/1988
Penalty Type:	Final Monetary Penalty
Regulation Violated:	Not reported
Area of Violation:	TSD-OTHER REQUIREMENTS
Date Violation Determined:	10/09/1986
Actual Date Achieved Compliance:	03/25/1998
Enforcement Action.	WRITTEN INFORMAL
Enforcement Action Date:	04/06/1987
Penalty Type:	Final Monetary Penalty
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	12/29/1988
Penalty Type:	Final Monetary Penalty
Enforcement Action:	FINAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date:	04/18/1989
Penalty Type:	Final Monetary Penalty
Regulation Violated.	Not reported
Area of Violation:	TSD-CLOSURE/POST-CLOSURE REQUIREMENTS

PATRICK METALS ELKHART (Continued) 1000892729

Date Violation Determined: 10/11/1984
Actual Date Achieved Compliance: 03/25/1998

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 04/06/1987
Penalty Type: Final Monetary Penalty

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 12/29/1988
Penalty Type: Final Monetary Penalty

Enforcement Action: FINAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date 04/18/1989
Penalty Type: Final Monetary Penalty

Regulation Violated: Not reported
Area of Violation: GENERATOR-OTHER REQUIREMENTS
Date Violation Determined: 10/11/1984
Actual Date Achieved Compliance: 03/25/1998

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 04/06/1987
Penalty Type: Final Monetary Penalty

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 12/29/1988
Penalty Type: Final Monetary Penalty

Enforcement Action FINAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date. 04/18/1989
Penalty Type: Final Monetary Penalty

There are 30 violation record(s) reported at this site:

Evaluation	Area of Violation	Date of Compliance
Compliance Schedule Evaluation	GENERATOR-PRE-TRANSPORT REQUIREMENTS	
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	
Compliance Evaluation Inspection	GENERATOR-PRE-TRANSPORT REQUIREMENTS	
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	
Compliance Schedule Evaluation	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19980130
	INUWR	19980130
Compliance Evaluation Inspection	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19980130
	INUWR	19980130
Compliance Evaluation Inspection	TSD-GENERAL STANDARDS	19980325
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19980325
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19980325
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19980325
	TSD-LAND BAN REQUIREMENTS	19980325
	GENERATOR-GENERAL REQUIREMENTS	19980325
	GENERATOR-MANIFEST REQUIREMENTS	19980325
	GENERATOR-GENERAL REQUIREMENTS	19980325
	GENERATOR-OTHER REQUIREMENTS	19980325
Financial Record Review	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS	19980325
Compliance Evaluation Inspection	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19980325
	TSD-CLOSURE/POST-CLOSURE REQUIREMENTS	19980325
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19980325
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19980325

PATRICK METALS ELKHART (Continued) **1000892729**

	GENERATOR-OTHER REQUIREMENTS	19980325
	TSD-CLOSURE/POST-CLOSURE REQUIREMENTS	19980325
Financial Record Review	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS	19980325
Compliance Evaluation Inspection	GENERATOR-PRE-TRANSPORT REQUIREMENTS	
	TSD-CLOSURE/POST-CLOSURE REQUIREMENTS	
	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS	
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	
Compliance Evaluation Inspection	TSD-CLOSURE/POST-CLOSURE REQUIREMENTS	19980325
	TSD-OTHER REQUIREMENTS	19980325
	GENERATOR-OTHER REQUIREMENTS	19980325
Financial Record Review	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS	19980325
Non-Financial Record Review	TSD-CLOSURE/POST-CLOSURE REQUIREMENTS	19980325
	TSD-OTHER REQUIREMENTS	19980325
	GENERATOR-OTHER REQUIREMENTS	19980325
Compliance Evaluation Inspection	TSD-CLOSURE/POST-CLOSURE REQUIREMENTS	19980325
	TSD-OTHER REQUIREMENTS	19980325
	GENERATOR-OTHER REQUIREMENTS	19980325
Compliance Evaluation Inspection	TSD-CLOSURE/POST-CLOSURE REQUIREMENTS	19980325
	GENERATOR-OTHER REQUIREMENTS	19980325

FINDS:
Other Pertinent Environmental Activity Identified at Site:
Aerometric Information Retrieval System/AIRS Facility Subsystem
Indiana Facility Registry System
National Emissions Inventory
Resource Conservation and Recovery Act Information system
Toxics Release Inventory

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7 **FIDLER, INC.** **MINES** **M100027133**
SW **N/A**
1/8-1/4 **ELKHART (County), IN**
1164 ft.

Relative:
Higher

Actual:
755 ft.

U S MINES:

Mine ID	1200779	SIC Codes.	14410 00000 00000 00000 00000 00000
Entity Name	PIT #3	Company:	FIDLER, INC.
State FIPS code:	18	County FIPS code:	039
Status Date	12/06/1977	Status:	Not reported
Operation Class.	Non-coal mining	Number of Shops:	6
Number of Pits:	000	Number of Plants:	0
Latitude.	41 40 12	Longitude:	085 59 16

FIDLER, INC. (Continued) **M100027133**

U S MINE VIOLATIONS

Operator:	Fidler Inc		
Mine Name:	Pit #3		
Mined Material:	Construction Sand and Gravel		
Ownership Date	03/01/00	Mine Type:	Surface
Mine Status:	Intermittent	Status Date:	12/06/77
Violation Number:	6156118	Date Issued:	04/16/03
Action Type:	104A		
Date Abated	04/16/03	Citation/Order:	C
S & S:	N	Standard	56
Proposed Penalty:	60	Contractor ID:	Not reported
Paid Penalty:	60		
Assess Case Status code:		Closed	
Assessment Status code:		Proposed	

Operator:	Fidler Inc		
Mine Name:	Pit #3		
Mined Material	Construction Sand and Gravel		
Ownership Date:	03/01/00	Mine Type.	Surface
Mine Status:	Intermittent	Status Date:	12/06/77
Violation Number:	6156590	Date Issued.	07/07/04
Action Type:	104A		
Date Abated.	07/08/04	Citation/Order:	C
S & S:	N	Standard:	56.12025
Proposed Penalty:	60	Contractor ID:	Not reported
Paid Penalty:	0		
Assess. Case Status code:		Received	
Assessment Status code:		Proposed	

A8 **HERMASEAL CO** **RCRA-SQG** **1000841365**
NNE **1101 LAFAYETTE ST** **FINDS** **46515HRMSL11**
1/8-1/4 **ELKHART, IN 46514** **TRIS**
1277 ft. **RCRA-TSDF**
CORRACTS

Site 1 of 3 in cluster A

Relative: Higher

CORRACTS Data:

Actual: 753 ft.

EPA Id:	IND980501936
Region:	5
Area Name:	ENTIRE FACILITY
Actual Date:	12/28/1992
Corrective Action:	CA075LO - CA Prioritization, Facility or area was assigned a low corrective action priority
2002 NAICS Title:	Not Reported

RCRAInfo Corrective Action Summary:

Event:	CA Prioritization, Facility or area was assigned a low corrective action priority.
Event Date.	12/28/1992

HERMASEAL CO (Continued) **1000841365**

RCRAInfo:
Owner: DURAKOOL INC
(312) 555-1212
EPA ID: IND980501936
Contact: GEORGE BUCKLEN
(219) 264-1116
Classification: TSDF
TSDF Activities: Not reported

BIENNIAL REPORTS:
Last Biennial Reporting Year: 2001

Waste	Quantity (Lbs)	Waste	Quantity (Lbs)
D009	8280 00	F001	3784.00
F006	1300.00	U151	25.00

Violation Status: Violations exist

Regulation Violated: Not reported
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined: 01/29/1997
Actual Date Achieved Compliance: 07/24/1997
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/18/1997
Penalty Type: Not reported

Regulation Violated: Not reported
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined 01/29/1997
Actual Date Achieved Compliance: 07/24/1997
Enforcement Action WRITTEN INFORMAL
Enforcement Action Date 02/18/1997
Penalty Type: Not reported

Regulation Violated: Not reported
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined. 01/29/1997
Actual Date Achieved Compliance: 07/24/1997
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/18/1997
Penalty Type: Not reported

Regulation Violated. Not reported
Area of Violation: TSD-CLOSURE/POST-CLOSURE REQUIREMENTS
Date Violation Determined. 01/29/1996
Actual Date Achieved Compliance: 07/24/1997
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/18/1997
Penalty Type: Not reported

Regulation Violated: 262C
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined: 03/14/1994
Actual Date Achieved Compliance: 10/01/1994
Enforcement Action WRITTEN INFORMAL
Enforcement Action Date. 06/01/1994
Penalty Type Not reported

HERMASEAL CO (Continued) **1000841365**

Regulation Violated	264.16
Area of Violation:	TSD-GENERAL STANDARDS
Date Violation Determined.	03/14/1994
Actual Date Achieved Compliance:	10/01/1994
Enforcement Action.	WRITTEN INFORMAL
Enforcement Action Date:	06/01/1994
Penalty Type·	Not reported
Regulation Violated:	264.73
Area of Violation:	TSD-OTHER REQUIREMENTS
Date Violation Determined.	03/14/1994
Actual Date Achieved Compliance.	10/01/1994
Enforcement Action.	WRITTEN INFORMAL
Enforcement Action Date:	06/01/1994
Penalty Type·	Not reported
Regulation Violated·	Not reported
Area of Violation:	TSD-OTHER REQUIREMENTS
Date Violation Determined·	02/13/1992
Actual Date Achieved Compliance:	02/08/1993
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date·	05/18/1992
Penalty Type:	Not reported
Regulation Violated:	Not reported
Area of Violation·	GENERATOR-GENERAL REQUIREMENTS
Date Violation Determined:	02/13/1992
Actual Date Achieved Compliance.	02/08/1993
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date·	05/18/1992
Penalty Type:	Not reported
Regulation Violated:	Not reported
Area of Violation	TSD-OTHER REQUIREMENTS
Date Violation Determined	02/13/1992
Actual Date Achieved Compliance	02/08/1993
Enforcement Action	WRITTEN INFORMAL
Enforcement Action Date:	05/18/1992
Penalty Type	Not reported
Regulation Violated:	40 CFR 268.50
Area of Violation:	TSD-LAND BAN REQUIREMENTS
Date Violation Determined.	02/13/1992
Actual Date Achieved Compliance·	06/22/1993
Regulation Violated:	Not reported
Area of Violation	GENERATOR-LAND BAN REQUIREMENTS
Date Violation Determined:	12/01/1989
Actual Date Achieved Compliance·	04/02/1991
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date	11/26/1990
Penalty Type·	Not reported
Regulation Violated.	Not reported
Area of Violation:	TSD-LAND BAN REQUIREMENTS
Date Violation Determined:	12/01/1989
Actual Date Achieved Compliance:	04/02/1991

HERMASEAL CO (Continued) **1000841365**

Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	11/26/1990
Penalty Type:	Not reported
Regulation Violated:	Not reported
Area of Violation.	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS
Date Violation Determined	12/21/1987
Actual Date Achieved Compliance:	01/24/1991
Enforcement Action:	INITIAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date	09/30/1988
Penalty Type	Final Monetary Penalty
Regulation Violated.	Not reported
Area of Violation:	TSD-OTHER REQUIREMENTS (OVERSIGHT)
Date Violation Determined.	12/21/1987
Actual Date Achieved Compliance:	01/24/1991
Enforcement Action:	INITIAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date:	09/30/1988
Penalty Type:	Final Monetary Penalty
Regulation Violated:	Not reported
Area of Violation:	TSD-OTHER REQUIREMENTS (OVERSIGHT)
Date Violation Determined	12/21/1987
Actual Date Achieved Compliance	01/24/1991
Enforcement Action:	INITIAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date:	09/30/1988
Penalty Type:	Final Monetary Penalty
Regulation Violated.	Not reported
Area of Violation:	GENERATOR-LAND BAN REQUIREMENTS
Date Violation Determined:	12/21/1987
Actual Date Achieved Compliance:	Not reported
Regulation Violated.	Not reported
Area of Violation:	TSD-LAND BAN REQUIREMENTS
Date Violation Determined	12/21/1987
Actual Date Achieved Compliance:	Not reported

There are 18 violation record(s) reported at this site

Evaluation	Area of Violation	Date of Compliance
Compliance Schedule Evaluation	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19970724
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19970724
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19970724
Compliance Evaluation Inspection	TSD-CLOSURE/POST-CLOSURE REQUIREMENTS	19970724
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19970724
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19970724
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19970724
Compliance Evaluation Inspection	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19941001
	TSD-GENERAL STANDARDS	19941001
	TSD-OTHER REQUIREMENTS	19941001
Compliance Schedule Evaluation	TSD-OTHER REQUIREMENTS	19930208
	GENERATOR-GENERAL REQUIREMENTS	19930208
	TSD-OTHER REQUIREMENTS	19930208
Compliance Evaluation Inspection	TSD-OTHER REQUIREMENTS	19930208
	GENERATOR-GENERAL REQUIREMENTS	19930208
	TSD-OTHER REQUIREMENTS	19930208
Land Disposal Restriction Requirements In	TSD-LAND BAN REQUIREMENTS	19930622

HERMASEAL CO (Continued) **1000841365**

Other Evaluation	GENERATOR-LAND BAN REQUIREMENTS	19910402
	TSD-LAND BAN REQUIREMENTS	19910402
Compliance Evaluation Inspection	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS	19910124
	TSD-OTHER REQUIREMENTS (OVERSIGHT)	19910124
	TSD-OTHER REQUIREMENTS (OVERSIGHT)	19910124
Other Evaluation	GENERATOR-LAND BAN REQUIREMENTS	
	TSD-LAND BAN REQUIREMENTS	

FINDS.
Other Pertinent Environmental Activity Identified at Site:
Indiana Facility Registry System
Resource Conservation and Recovery Act Information system
Toxics Release Inventory

A9
NNE
1/8-1/4
1277 ft.

Relative:
Higher

Actual:
753 ft.

AMERICAN ELECTRONIC COMPONENTS-LAF RCRA-SQG 1007093588
1101 LAFAYETTE ST INR000109942
ELKHART, IN 46516

Site 2 of 3 in cluster A

RCRAInfo:
Owner: AMERICAN ELECTRONIC COMPONENTS
EPA ID: INR000109942
Contact: KENT SAYRE
(574) 264-1116
Classification: Small Quantity Generator
TSDF Activities: Not reported
Violation Status: No violations found

A10
NNE
1/8-1/4
1277 ft.

Relative:
Higher

Actual:
753 ft.

HERMASEAL CO RCRA-SQG 1000296493
1101 LAFAYETTE ST INT190010900
ELKHART, IN 46515

Site 3 of 3 in cluster A

RCRAInfo
Owner: NAME NOT REPORTED
(312) 555-1212
EPA ID: INT190010900
Contact: Not reported
Classification: Small Quantity Generator
TSDF Activities: Not reported
Violation Status: No violations found

11
WNW
1/4-1/2
1862 ft.

SMOKE EXPRESS #3
1589 W FRANKLIN ST
ELKHART, IN 46516

LUST **U000191273**
UST **N/A**

Relative:
Lower

Actual:
729 ft.

LUST:

Facility ID.	9068
Owner Name:	Yoder Mart
Incident Number:	198912516
Priority:	Medium
Affected Area:	Soil
Description	Active

UST:

Facility ID:	9068
Tank Number	1
Tank Status.	PERMANENTLY OUT OF SERVICE
Install Date:	/ /
Closure Date:	Not reported
Owner Id.	7610
Company Name	National Oil & Gas Inc
Mailing Address:	409 N Main St Po Box 476
	Bluffton, IN 46714
Closure Status:	Open

Facility ID:	9068
Tank Number:	2
Tank Status:	PERMANENTLY OUT OF SERVICE
Install Date:	/ /
Closure Date	Not reported
Owner Id:	7610
Company Name:	National Oil & Gas Inc
Mailing Address.	409 N Main St Po Box 476
	Bluffton, IN 46714
Closure Status	Open

Facility ID:	9068
Tank Number:	3
Tank Status	PERMANENTLY OUT OF SERVICE
Install Date.	/ /
Closure Date.	Not reported
Owner Id:	7610
Company Name:	National Oil & Gas Inc
Mailing Address	409 N Main St Po Box 476
	Bluffton, IN 46714
Closure Status:	Open

Facility ID	9068
Tank Number:	11
Tank Status:	CURRENTLY IN USE
Install Date	01/15/1990
Closure Date:	Not reported
Owner Id:	7610
Company Name	National Oil & Gas Inc
Mailing Address:	409 N Main St Po Box 476
	Bluffton, IN 46714
Closure Status:	Open

Facility ID:	9068

SMOKE EXPRESS #3 (Continued) **U000191273**

Tank Number: 12
Tank Status CURRENTLY IN USE
Install Date: *01/15/1990*
Closure Date: Not reported
Owner Id. 7610
Company Name: National Oil & Gas Inc
Mailing Address: 409 N Main St Po Box 476
Bluffton, IN 46714
Closure Status. Open

Facility ID 9068
Tank Number: 13
Tank Status: CURRENTLY IN USE
Install Date. 01/15/1990
Closure Date. Not reported
Owner Id: 7610
Company Name: National Oil & Gas Inc
Mailing Address. 409 N Main St Po Box 476
Bluffton, IN 46714
Closure Status: Open

12
South
1/4-1/2
2077 ft.

Relative:
Higher

Actual:
756 ft.

OAKLAND AUTO SERVICE LUST U003094732
1207 W LUSHER AVE UST N/A
ELKHART, IN 46517

LUST:
Facility ID: 17117
Owner Name Oaklawn Service
Incident Number 199008593
Priority Low
Affected Area: Soil
Description: NFA-94 guidance

UST
Facility ID. 17117
Tank Number: 4
Tank Status: PERMANENTLY OUT OF SERVICE
Install Date: 01/01/1955
Closure Date: 9/8/1995 0:00
Owner Id: 9609
Company Name: Gerald Mclemore
Mailing Address 1207 W Lusher Ave
Elkhart, IN 46517
Closure Status: Open

Facility ID: 17117
Tank Number: 3
Tank Status: PERMANENTLY OUT OF SERVICE
Install Date: 01/01/1955
Closure Date: 9/8/1995 0.00
Owner Id: 9609
Company Name: Gerald Mclemore
Mailing Address: 1207 W Lusher Ave
Elkhart, IN 46517
Closure Status: Open

Facility ID: 17117

OAKLAND AUTO SERVICE (Continued) **U003094732**

Tank Number: 2
Tank Status: PERMANENTLY OUT OF SERVICE
Install Date: 01/01/1955
Closure Date: 9/8/1995 0:00
Owner Id 9609
Company Name Gerald Mclemore
Mailing Address: 1207 W Lusher Ave
Elkhart, IN 46517
Closure Status. Open

Facility ID: 17117
Tank Number: 1
Tank Status: PERMANENTLY OUT OF SERVICE
Install Date: 01/01/1955
Closure Date: 9/8/1995 0 00
Owner Id: 9609
Company Name. Gerald Mclemore
Mailing Address. 1207 W Lusher Ave
Elkhart, IN 46517
Closure Status: Open

ORPHAN SUMMARY

City	EDR ID	Site Name	Site Address	Zip	Database(s)
ELKHART	U000185035	HUDSON BUILDING SUPPLY	30244 CR 12		IN Spills, UST
ELKHART	U000186214	SIX SPAN AMOCO	21870 SR 120	46516	UST
ELKHART	U001444341	SIX SPAN AMOCO	21870 SR 120	46516	LUST
ELKHART	S106488209	WARNER & SONS INC C/D SITE	29099 US 33 W	46516	SWF/LF
ELKHART	S106488208	ELKHART COUNTY LANDFILL	59530 CR 7 SOUTH	46517	SWF/LF
ELKHART	S105678277	LUSHER AVENUE	CR18 AND 21ST STREET		SHWS
ELKHART	1003873057	WAGNER AVENUE SITE	NW CORNER OF WAGNER & SIXTH STREET	46516	CERC-NFRAP
ELKHART	U003209636	VARIOUS SITES	W FRANKLIN / INDIANA		LUST, UST
ELKHART	S105702675	INDIANA AVENUE LANDFILL	INDIANA AVENUE	46516	Brownfields
ELKHART	1001114913	WOODLAWN INDUSTRIAL DEVELOPMENT	INTERSECTION OF WOODLAWN & MCNAUGHTON	46516	CERCLIS, FINDS
ELKHART	1003870929	ELKHART GASOLINE SPILL	ST JOSEPH RIV & FRANKLIN ST	46516	CERC-NFRAP
ELKHART	1007093256	S AND S BODY SHOP	500 DR KING DR	46516	RCRA-SQG
ELKHART	S106350070	SEE FAC ID 10907 DUP FILE 2	N LUSHER ST		LUST
ELKHART	1004698782	INDIANA MICHIGAN POWER	3340 US RT 20 E	46516	RCRA-SQG, FINDS
ELKHART	1007444074	CEISNICKI DUMP	0.5 MI SOUTH OF US 20, EAST SIDE OF STATE ROAD 219		ODI
ELKHART	S105588662	BENHAM WEST BROWNFIELD SITE	6TH STREET/INDIANA AVENUE/OAKL	46516	Brownfields
ELKHART	S104325407	SYCAMORE STREET	100 SYCAMORE STREET		SHWS

EPA Waste Codes Addendum

Code	Description
D001	IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKY-MARTENS CLOSED CUP FLASH POINT TESTER ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET, WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.
D008	LEAD
D009	MERCURY
F001	THE FOLLOWING SPENT HALOGENATED SOLVENTS USED IN DEGREASING: TETRACHLOROETHYLENE, TRICHLOROETHYLENE, METHYLENE CHLORIDE, 1,1,1-TRICHLOROETHANE, CARBON TETRACHLORIDE, AND CHLORINATED FLUOROCARBONS; ALL SPENT SOLVENT MIXTURES/BLENDS USED IN DEGREASING CONTAINING, BEFORE USE, A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THE ABOVE HALOGENATED SOLVENTS OR THOSE SOLVENTS LISTED IN F002, F004, AND F005, AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.
F003	THE FOLLOWING SPENT NON-HALOGENATED SOLVENTS: XYLENE, ACETONE, ETHYL ACETATE, ETHYL BENZENE, ETHYL ETHER, METHYL ISOBUTYL KETONE, N-BUTYL ALCOHOL, CYCLOHEXANONE, AND METHANOL, ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, ONLY THE ABOVE SPENT NON-HALOGENATED SOLVENTS; AND ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, ONE OR MORE OF THE ABOVE NON-HALOGENATED SOLVENTS, AND, A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THOSE SOLVENTS LISTED IN F001, F002, F004, AND F005, AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.
F005	THE FOLLOWING SPENT NON-HALOGENATED SOLVENTS: TOLUENE, METHYL ETHYL KETONE, CARBON DISULFIDE, ISOBUTANOL, PYRIDINE, BENZENE, 2-ETHOXYETHANOL, AND 2-NITROPROPANE; ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THE ABOVE NON-HALOGENATED SOLVENTS OR THOSE SOLVENTS LISTED IN F001, F002, OR F004, AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.
F006	WASTEWATER TREATMENT SLUDGES FROM ELECTROPLATING OPERATIONS EXCEPT FROM THE FOLLOWING PROCESSES: (1) SULFURIC ACID ANODIZING OF ALUMINUM; (2) TIN PLATING ON CARBON STEEL; (3) ZINC PLATING (SEGREGATED BASIS) ON CARBON STEEL; (4) ALUMINUM OR ZINC-ALUMINUM PLATING ON CARBON STEEL; (5) CLEANING/STRIPPING ASSOCIATED WITH TIN, ZINC AND ALUMINUM PLATING ON CARBON STEEL; AND (6) CHEMICAL ETCHING AND MILLING OF ALUMINUM.
U151	MERCURY

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

To maintain currency of the following federal and state databases, EDR contacts the appropriate governmental agency on a monthly or quarterly basis, as required

Elapsed ASTM days: Provides confirmation that this EDR report meets or exceeds the 90-day updating requirement of the ASTM standard

FEDERAL ASTM STANDARD RECORDS

NPL: National Priority List
Source EPA
Telephone N/A
National Priorities List (Superfund). The NPL is a subset of CERCLIS and identifies over 1,200 sites for priority cleanup under the Superfund Program NPL sites may encompass relatively large areas As such, EDR provides polygon coverage for over 1,000 NPL site boundaries produced by EPA's Environmental Photographic Interpretation Center (EPIC) and regional EPA offices.

Date of Government Version 10/12/04
Date Made Active at EDR: 12/09/04
Database Release Frequency: Semi-Annually

Date of Data Arrival at EDR 11/02/04
Elapsed ASTM days: 37
Date of Last EDR Contact: 11/02/04

NPL Site Boundaries

Sources:

EPA's Environmental Photographic Interpretation Center (EPIC)
Telephone: 202-564-7333

EPA Region 1
Telephone 617-918-1143

EPA Region 3
Telephone 215-814-5418

EPA Region 4
Telephone 404-562-8033

EPA Region 6
Telephone: 214-655-6659

EPA Region 8
Telephone 303-312-6774

Proposed NPL: Proposed National Priority List Sites
Source: EPA
Telephone: N/A

Date of Government Version: 09/23/04
Date Made Active at EDR 12/09/04
Database Release Frequency: Semi-Annually

Date of Data Arrival at EDR: 11/02/04
Elapsed ASTM days: 37
Date of Last EDR Contact: 11/02/04

CERCLIS: Comprehensive Environmental Response, Compensation, and Liability Information System
Source: EPA
Telephone: 703-413-0223
CERCLIS contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) CERCLIS contains sites which are either proposed to or on the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL.

Date of Government Version: 08/10/04
Date Made Active at EDR. 10/27/04
Database Release Frequency Quarterly

Date of Data Arrival at EDR. 09/21/04
Elapsed ASTM days. 36
Date of Last EDR Contact 12/21/04

CERCLIS-NFRAP: CERCLIS No Further Remedial Action Planned
Source: EPA
Telephone: 703-413-0223
As of February 1995, CERCLIS sites designated "No Further Remedial Action Planned" (NFRAP) have been removed from CERCLIS. NFRAP sites may be sites where, following an initial investigation, no contamination was found, contamination was removed quickly without the need for the site to be placed on the NPL, or the contamination was not serious enough to require Federal Superfund action or NPL consideration. EPA has removed approximately 25,000 NFRAP sites to lift the unintended barriers to the redevelopment of these properties and has archived them as historical records so EPA does not needlessly repeat the investigations in the future. This policy change is part of the EPA's Brownfields Redevelopment Program to help cities, states, private investors and affected citizens to promote economic redevelopment of unproductive urban sites.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 08/10/04
Date Made Active at EDR: 10/27/04
Database Release Frequency: Quarterly
Date of Data Arrival at EDR: 09/21/04
Elapsed ASTM days: 36
Date of Last EDR Contact: 12/21/04

CORRACTS: Corrective Action Report
Source: EPA
Telephone: 800-424-9346
CORRACTS identifies hazardous waste handlers with RCRA corrective action activity

Date of Government Version: 09/23/04
Date Made Active at EDR: 11/18/04
Database Release Frequency: Semi-Annually
Date of Data Arrival at EDR: 10/07/04
Elapsed ASTM days: 42
Date of Last EDR Contact: 12/07/04

RCRA: Resource Conservation and Recovery Act Information
Source: EPA
Telephone: 800-424-9346
RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. RCRAInfo replaces the data recording and reporting abilities of the Resource Conservation and Recovery Information System (RCRIS). The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month. Large quantity generators (LQGs) generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month. Transporters are individuals or entities that move hazardous waste from the generator off-site to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.

Date of Government Version: 11/23/04
Date Made Active at EDR: 01/18/05
Database Release Frequency: Varies
Date of Data Arrival at EDR: 11/24/04
Elapsed ASTM days: 55
Date of Last EDR Contact: 11/24/04

ERNS: Emergency Response Notification System
Source: National Response Center, United States Coast Guard
Telephone: 202-260-2342
Emergency Response Notification System. ERNS records and stores information on reported releases of oil and hazardous substances

Date of Government Version: 12/31/03
Date Made Active at EDR: 03/12/04
Database Release Frequency: Annually
Date of Data Arrival at EDR: 01/26/04
Elapsed ASTM days: 46
Date of Last EDR Contact: 10/25/04

FEDERAL ASTM SUPPLEMENTAL RECORDS

BRS: Biennial Reporting System
Source: EPA/NTIS
Telephone: 800-424-9346
The Biennial Reporting System is a national system administered by the EPA that collects data on the generation and management of hazardous waste. BRS captures detailed data from two groups: Large Quantity Generators (LQG) and Treatment, Storage, and Disposal Facilities.

Date of Government Version: 12/01/01
Database Release Frequency: Biennially
Date of Last EDR Contact: 12/13/04
Date of Next Scheduled EDR Contact: 03/14/05

CONSENT: Superfund (CERCLA) Consent Decrees
Source: Department of Justice, Consent Decree Library
Telephone: Varies
Major legal settlements that establish responsibility and standards for cleanup at NPL (Superfund) sites. Released periodically by United States District Courts after settlement by parties to litigation matters.

Date of Government Version: 03/05/04
Database Release Frequency: Varies
Date of Last EDR Contact 10/25/04
Date of Next Scheduled EDR Contact: 01/24/05

ROD: Records Of Decision
Source EPA
Telephone: 703-416-0223
Record of Decision. ROD documents mandate a permanent remedy at an NPL (Superfund) site containing technical and health information to aid in the cleanup

Date of Government Version: 09/09/04
Database Release Frequency Annually
Date of Last EDR Contact: 01/05/05
Date of Next Scheduled EDR Contact 04/04/05

DELISTED NPL: National Priority List Deletions
Source. EPA
Telephone: N/A
The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establishes the criteria that the EPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425 (e), sites may be deleted from the NPL where no further response is appropriate.

Date of Government Version: 10/12/04
Database Release Frequency. Quarterly
Date of Last EDR Contact: 11/02/04
Date of Next Scheduled EDR Contact 01/31/05

FINDS: Facility Index System/Facility Identification Initiative Program Summary Report
Source: EPA
Telephone: N/A
Facility Index System. FINDS contains both facility information and 'pointers' to other sources that contain more detail EDR includes the following FINDS databases in this report: PCS (Permit Compliance System), AIRS (Aerometric Information Retrieval System), DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes), FURS (Federal Underground Injection Control), C-DOCKET (Criminal Docket System used to track criminal enforcement actions for all environmental statutes), FFIS (Federal Facilities Information System), STATE (State Environmental Laws and Statutes), and PADS (PCB Activity Data System)

Date of Government Version: 09/09/04
Database Release Frequency: Quarterly
Date of Last EDR Contact: 01/03/05
Date of Next Scheduled EDR Contact 04/04/05

HMIRS: Hazardous Materials Information Reporting System
Source: U.S. Department of Transportation
Telephone 202-366-4555
Hazardous Materials Incident Report System. HMIRS contains hazardous material spill incidents reported to DOT.

Date of Government Version 09/08/04
Database Release Frequency Annually
Date of Last EDR Contact: 10/28/04
Date of Next Scheduled EDR Contact: 01/17/05

MLTS: Material Licensing Tracking System
Source: Nuclear Regulatory Commission
Telephone: 301-415-7169
MLTS is maintained by the Nuclear Regulatory Commission and contains a list of approximately 8,100 sites which possess or use radioactive materials and which are subject to NRC licensing requirements. To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 07/15/04
Database Release Frequency: Quarterly
Date of Last EDR Contact: 01/03/05
Date of Next Scheduled EDR Contact: 04/04/05

MINES: Mines Master Index File
Source: Department of Labor, Mine Safety and Health Administration
Telephone. 303-231-5959

Date of Government Version: 09/13/04
Database Release Frequency: Semi-Annually
Date of Last EDR Contact: 12/28/04
Date of Next Scheduled EDR Contact: 03/28/05

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

NPL LIENS: Federal Superfund Liens
Source: EPA
Telephone: 202-564-4267
Federal Superfund Liens. Under the authority granted the USEPA by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980, the USEPA has the authority to file liens against real property in order to recover remedial action expenditures or when the property owner receives notification of potential liability. USEPA compiles a listing of filed notices of Superfund Liens.

Date of Government Version: 10/15/91
Database Release Frequency: No Update Planned
Date of Last EDR Contact 11/22/04
Date of Next Scheduled EDR Contact: 02/21/05

PADS: PCB Activity Database System
Source: EPA
Telephone: 202-564-3887
PCB Activity Database PADS Identifies generators, transporters, commercial storers and/or brokers and disposers of PCB's who are required to notify the EPA of such activities

Date of Government Version: 09/30/04
Database Release Frequency: Annually
Date of Last EDR Contact. 11/12/04
Date of Next Scheduled EDR Contact. 02/07/05

DOD: Department of Defense Sites
Source: USGS
Telephone: 703-692-8801
This data set consists of federally owned or administered lands, administered by the Department of Defense, that have any area equal to or greater than 640 acres of the United States, Puerto Rico, and the U.S. Virgin Islands.

Date of Government Version: 10/01/03
Database Release Frequency: Semi-Annually
Date of Last EDR Contact: 11/12/04
Date of Next Scheduled EDR Contact 02/07/05

UMTRA: Uranium Mill Tailings Sites
Source Department of Energy
Telephone 505-845-0011
Uranium ore was mined by private companies for federal government use in national defense programs. When the mills shut down, large piles of the sand-like material (mill tailings) remain after uranium has been extracted from the ore. Levels of human exposure to radioactive materials from the piles are low; however, in some cases tailings were used as construction materials before the potential health hazards of the tailings were recognized. In 1978, 24 inactive uranium mill tailings sites in Oregon, Idaho, Wyoming, Utah, Colorado, New Mexico, Texas, North Dakota, South Dakota, Pennsylvania, and on Navajo and Hopi tribal lands, were targeted for cleanup by the Department of Energy

Date of Government Version: 04/22/04
Database Release Frequency Varies
Date of Last EDR Contact: 12/21/04
Date of Next Scheduled EDR Contact: 03/21/05

ODI: Open Dump Inventory
Source Environmental Protection Agency
Telephone 800-424-9346
An open dump is defined as a disposal facility that does not comply with one or more of the Part 257 or Part 258 Subtitle D Criteria

Date of Government Version: 06/30/85
Database Release Frequency: No Update Planned
Date of Last EDR Contact: 05/23/95
Date of Next Scheduled EDR Contact: N/A

FUDS: Formerly Used Defense Sites
Source U S Army Corps of Engineers
Telephone: 202-528-4285
The listing includes locations of Formerly Used Defense Sites properties where the US Army Corps of Engineers is actively working or will take necessary cleanup actions.

Date of Government Version: 12/31/03
Database Release Frequency: Varies
Date of Last EDR Contact: 01/03/05
Date of Next Scheduled EDR Contact 04/04/05

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

INDIAN RESERV: Indian Reservations
Source: USGS
Telephone 202-208-3710
This map layer portrays Indian administered lands of the United States that have any area equal to or greater than 640 acres.

Date of Government Version 10/01/03
Database Release Frequency: Semi-Annually
Date of Last EDR Contact. 11/12/04
Date of Next Scheduled EDR Contact: 02/07/05

RAATS: RCRA Administrative Action Tracking System
Source EPA
Telephone 202-564-4104
RCRA Administration Action Tracking System. RAATS contains records based on enforcement actions issued under RCRA pertaining to major violators and includes administrative and civil actions brought by the EPA For administration actions after September 30, 1995, data entry in the RAATS database was discontinued. EPA will retain a copy of the database for historical records It was necessary to terminate RAATS because a decrease in agency resources made it impossible to continue to update the information contained in the database.

Date of Government Version: 04/17/95
Database Release Frequency No Update Planned
Date of Last EDR Contact: 12/06/04
Date of Next Scheduled EDR Contact. 03/07/05

TRIS: Toxic Chemical Release Inventory System
Source: EPA
Telephone: 202-566-0250
Toxic Release Inventory System TRIS identifies facilities which release toxic chemicals to the air, water and land in reportable quantities under SARA Title III Section 313.

Date of Government Version: 12/31/02
Database Release Frequency: Annually
Date of Last EDR Contact 12/20/04
Date of Next Scheduled EDR Contact: 03/21/05

TSCA: Toxic Substances Control Act
Source: EPA
Telephone: 202-260-5521
Toxic Substances Control Act. TSCA identifies manufacturers and importers of chemical substances included on the TSCA Chemical Substance Inventory list It includes data on the production volume of these substances by plant site.

Date of Government Version: 12/31/02
Database Release Frequency: Every 4 Years
Date of Last EDR Contact: 12/06/04
Date of Next Scheduled EDR Contact: 03/07/05

FTTS INSP: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
Source EPA
Telephone: 202-564-2501

Date of Government Version: 04/13/04
Database Release Frequency Quarterly
Date of Last EDR Contact: 12/01/04
Date of Next Scheduled EDR Contact: 03/21/05

SSTS: Section 7 Tracking Systems
Source: EPA
Telephone 202-564-5008
Section 7 of the Federal Insecticide, Fungicide and Rodenticide Act, as amended (92 Stat. 829) requires all registered pesticide-producing establishments to submit a report to the Environmental Protection Agency by March 1st each year. Each establishment must report the types and amounts of pesticides, active ingredients and devices being produced, and those having been produced and sold or distributed in the past year.

Date of Government Version: 12/31/03
Database Release Frequency: Annually
Date of Last EDR Contact: 11/29/04
Date of Next Scheduled EDR Contact: 04/18/05

FTTS: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
Source. EPA/Office of Prevention, Pesticides and Toxic Substances
Telephone: 202-564-2501
FTTS tracks administrative cases and pesticide enforcement actions and compliance activities related to FIFRA, TSCA and EPCRA (Emergency Planning and Community Right-to-Know Act) To maintain currency, EDR contacts the Agency on a quarterly basis

Date of Government Version: 09/13/04
Database Release Frequency: Quarterly

Date of Last EDR Contact: 12/01/04
Date of Next Scheduled EDR Contact: 03/21/05

STATE OF INDIANA ASTM STANDARD RECORDS

SHWS: List of Hazardous Waste Response Sites Scored Using the Indiana Scoring Model
Source: Department of Environmental Management
Telephone: 317-308-3052
State Hazardous Waste Sites State hazardous waste site records are the states' equivalent to CERCLIS These sites may or may not already be listed on the federal CERCLIS list. Priority sites planned for cleanup using state funds (state equivalent of Superfund) are identified along with sites where cleanup will be paid for by potentially responsible parties Available information varies by state.

Date of Government Version: 03/01/04
Date Made Active at EDR: 04/21/04
Database Release Frequency Annually

Date of Data Arrival at EDR: 03/31/04
Elapsed ASTM days: 21
Date of Last EDR Contact: 12/29/04

SWF/LF: Permitted Solid Waste Facilities
Source: Department of Environmental Management
Telephone: 317-232-0066
Solid Waste Facilities/Landfill Sites. SWF/LF type records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites

Date of Government Version: 09/03/04
Date Made Active at EDR 11/17/04
Database Release Frequency: Semi-Annually

Date of Data Arrival at EDR: 10/14/04
Elapsed ASTM days 34
Date of Last EDR Contact: 01/11/05

LUST: Lust Leaking Underground Storage Tank List
Source: Department of Environmental Management
Telephone: 317-308-3008
Leaking Underground Storage Tank Incident Reports. LUST records contain an inventory of reported leaking underground storage tank incidents. Not all states maintain these records, and the information stored varies by state

Date of Government Version 08/04/04
Date Made Active at EDR: 10/21/04
Database Release Frequency: Annually

Date of Data Arrival at EDR 09/28/04
Elapsed ASTM days: 23
Date of Last EDR Contact: 12/28/04

UST: Indiana Registered Underground Storage Tanks
Source Department of Environmental Management
Telephone: 317-308-3008
Registered Underground Storage Tanks UST's are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA) and must be registered with the state department responsible for administering the UST program. Available information varies by state program.

Date of Government Version: 08/04/04
Date Made Active at EDR: 10/19/04
Database Release Frequency: Quarterly

Date of Data Arrival at EDR: 09/28/04
Elapsed ASTM days: 21
Date of Last EDR Contact: 12/28/04

VCP: Voluntary Remediation Program Site List
Source Department of Environmental Management
Telephone: 317-234-0966
A current list of Voluntary Remediation Program sites that are no longer confidential.

Date of Government Version: 09/01/04
Date Made Active at EDR: 12/13/04
Database Release Frequency Semi-Annually

Date of Data Arrival at EDR 11/09/04
Elapsed ASTM days: 34
Date of Last EDR Contact: 11/09/04

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

STATE OF INDIANA ASTM SUPPLEMENTAL RECORDS

SPILLS: Spills Incidents
Source: Department of Environmental Management
Telephone: 317-308-3008

Date of Government Version 08/04/04
Database Release Frequency: Semi-Annually

Date of Last EDR Contact: 12/28/04
Date of Next Scheduled EDR Contact: 03/28/05

BULK: Registered Bulk Fertilizer and Pesticide Storage Facilities
Source: Office of Indiana State Chemist
Telephone: 765-494-0579
A listing of registered dry or liquid bulk fertilizer and pesticide storage facilities.

Date of Government Version: 09/28/04
Database Release Frequency: Varies

Date of Last EDR Contact: 12/13/04
Date of Next Scheduled EDR Contact 03/14/05

DRYCLEANERS: Drycleaner Facility Listing
Source. Department of Environmental Management
Telephone: 800-988-7901
A list of drycleaners involved in the Indiana 5-Star Environmental Recognition Program. It is a voluntary program that ranks participating drycleaners on a scale of one to five stars The program recognizes those drycleaners willing to do more for the environment and worker safety than the rules require. These drycleaners are going above and beyond the rules to protect the environment, their employees and their neighbors and customers.

Date of Government Version: 07/31/04
Database Release Frequency: Varies

Date of Last EDR Contact: 01/14/05
Date of Next Scheduled EDR Contact: 04/11/05

EDR PROPRIETARY HISTORICAL DATABASES

Former Manufactured Gas (Coal Gas) Sites: The existence and location of Coal Gas sites is provided exclusively to EDR by Real Property Scan, Inc For a technical description of the types of hazards which may be found at such sites, contact your EDR customer service representative.

Disclaimer Provided by Real Property Scan, Inc.

The information contained in this report has predominantly been obtained from publicly available sources produced by entities other than Real Property Scan. While reasonable steps have been taken to insure the accuracy of this report, Real Property Scan does not guarantee the accuracy of this report. Any liability on the part of Real Property Scan is strictly limited to a refund of the amount paid No claim is made for the actual existence of toxins at any site. This report does not constitute a legal opinion.

BROWNFIELDS DATABASES

Brownfields: Brownfields Site List
Source: Department of Environmental Management
Telephone: 317-233-2570
A brownfield site is an industrial or commercial property that is abandoned, inactive, or underutilized, on which expansion or redeveloopment is complicated due to the actual or perceived environmental contamination.

Date of Government Version: 10/01/04
Database Release Frequency: Semi-Annually

Date of Last EDR Contact. 01/10/05
Date of Next Scheduled EDR Contact 03/28/05

VCP: Voluntary Remediation Program Site List
Source. Department of Environmental Management
Telephone 317-234-0966
A current list of Voluntary Remediation Program sites that are no longer confidential.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 09/01/04
Database Release Frequency: Semi-Annually

Date of Last EDR Contact: 11/09/04
Date of Next Scheduled EDR Contact: 02/07/05

AUL: Sites with Restrictions
Source: Department of Environmental Management
Telephone: 317-232-8603
Activity and use limitations include both engineering controls and institutional controls. A listing of Comfort/Site Status Letter sites that have been issued with controls.

Date of Government Version: 09/30/04
Database Release Frequency: Varies

Date of Last EDR Contact: 01/07/05
Date of Next Scheduled EDR Contact: 03/28/05

US BROWNFIELDS: A Listing of Brownfields Sites
Source: Environmental Protection Agency
Telephone: 202-566-2777
Included in the listing are brownfields properties addresses by Cooperative Agreement Recipients and brownfields properties addressed by Targeted Brownfields Assessments. Targeted Brownfields Assessments-EPA's Targeted Brownfields Assessments (TBA) program is designed to help states, tribes, and municipalities--especially those without EPA Brownfields Assessment Demonstration Pilots--minimize the uncertainties of contamination often associated with brownfields. Under the TBA program, EPA provides funding and/or technical assistance for environmental assessments at brownfields sites throughout the country. Targeted Brownfields Assessments supplement and work with other efforts under EPA's Brownfields Initiative to promote cleanup and redevelopment of brownfields. Cooperative Agreement Recipients-States, political subdivisions, territories, and Indian tribes become Brownfields Cleanup Revolving Loan Fund (BCRLF) cooperative agreement recipients when they enter into BCRLF cooperative agreements with the U.S. EPA. EPA selects BCRLF cooperative agreement recipients based on a proposal and application process. BCRLF cooperative agreement recipients must use EPA funds provided through BCRLF cooperative agreement for specified brownfields-related cleanup activities.

Date of Government Version: N/A
Database Release Frequency: Semi-Annually

Date of Last EDR Contact: N/A
Date of Next Scheduled EDR Contact: N/A

OTHER DATABASE(S)

Depending on the geographic area covered by this report, the data provided in these specialty databases may or may not be complete. For example, the existence of wetlands information data in a specific report does not mean that all wetlands in the area covered by the report are included. Moreover, the absence of any reported wetlands information does not necessarily mean that wetlands do not exist in the area covered by the report.

Oil/Gas Pipelines: This data was obtained by EDR from the USGS in 1994. It is referred to by USGS as GeoData Digital Line Graphs from 1:100,000-Scale Maps. It was extracted from the transportation category including some oil, but primarily gas pipelines.

Electric Power Transmission Line Data
Source: PennWell Corporation
Telephone: (800) 823-6277
This map includes information copyrighted by PennWell Corporation. This information is provided on a best effort basis and PennWell Corporation does not guarantee its accuracy nor warrant its fitness for any particular purpose. Such information has been reprinted with the permission of PennWell.

Sensitive Receptors: There are individuals deemed sensitive receptors due to their fragile immune systems and special sensitivity to environmental discharges. These sensitive receptors typically include the elderly, the sick, and children. While the location of all sensitive receptors cannot be determined, EDR indicates those buildings and facilities - schools, daycares, hospitals, medical centers, and nursing homes - where individuals who are sensitive receptors are likely to be located.

AHA Hospitals:
Source: American Hospital Association, Inc.
Telephone: 312-280-5991
The database includes a listing of hospitals based on the American Hospital Association's annual survey of hospitals.

Medical Centers: Provider of Services Listing
Source: Centers for Medicare & Medicaid Services
Telephone: 410-786-3000
A listing of hospitals with Medicare provider number, produced by Centers of Medicare & Medicaid Services, a federal agency within the U.S. Department of Health and Human Services.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Nursing Homes
Source National Institutes of Health
Telephone: 301-594-6248
Information on Medicare and Medicaid certified nursing homes in the United States.

Public Schools
Source: National Center for Education Statistics
Telephone: 202-502-7300
The National Center for Education Statistics' primary database on elementary and secondary public education in the United States. It is a comprehensive, annual, national statistical database of all public elementary and secondary schools and school districts, which contains data that are comparable across all states

Private Schools
Source: National Center for Education Statistics
Telephone. 202-502-7300
The National Center for Education Statistics' primary database on private school locations in the United States

Daycare Centers: child Care Listing
Source: Family & Social Services Administration
Telephone 317-232-4740

Flood Zone Data: This data, available in select counties across the country, was obtained by EDR in 1999 from the Federal Emergency Management Agency (FEMA). Data depicts 100-year and 500-year flood zones as defined by FEMA.

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 2002 from the U S. Fish and Wildlife Service.

STREET AND ADDRESS INFORMATION

GEOCHECK® - PHYSICAL SETTING SOURCE ADDENDUM

TARGET PROPERTY ADDRESS

STURGIN IRON AND METAL
1631 OAKLAND AVENUE
ELKHART, IN 46516

TARGET PROPERTY COORDINATES

Latitude (North):	41.672600 - 41° 40' 21 4"
Longitude (West).	85.985298 - 85° 59' 7.1"
Universal Tranverse Mercator:	Zone 16
UTM X (Meters):	584467.2
UTM Y (Meters):	4613710.5
Elevation:	750 ft above sea level

EDR's GeoCheck Physical Setting Source Addendum has been developed to assist the environmental professional with the collection of physical setting source information in accordance with ASTM 1527-00, Section 7 2.3. Section 7.2.3 requires that a current USGS 7.5 Minute Topographic Map (or equivalent, such as the USGS Digital Elevation Model) be reviewed. It also requires that one or more additional physical setting sources be sought when (1) conditions have been identified in which hazardous substances or petroleum products are likely to migrate to or from the property, and (2) more information than is provided in the current USGS 7.5 Minute Topographic Map (or equivalent) is generally obtained, pursuant to local good commercial or customary practice, to assess the impact of migration of recognized environmental conditions in connection with the property. Such additional physical setting sources generally include information about the topographic, hydrologic, hydrogeologic, and geologic characteristics of a site, and wells in the area.

Assessment of the impact of contaminant migration generally has two principle investigative components:

1. Groundwater flow direction, and
2. Groundwater flow velocity.

Groundwater flow direction may be impacted by surface topography, hydrology, hydrogeology, characteristics of the soil, and nearby wells. Groundwater flow velocity is generally impacted by the nature of the geologic strata. EDR's GeoCheck Physical Setting Source Addendum is provided to assist the environmental professional in forming an opinion about the impact of potential contaminant migration.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

GROUNDWATER FLOW DIRECTION INFORMATION

Groundwater flow direction for a particular site is best determined by a qualified environmental professional using site-specific well data. If such data is not reasonably ascertainable, it may be necessary to rely on other sources of information, such as surface topographic information, hydrologic information, hydrogeologic data collected on nearby properties, and regional groundwater flow information (from deep aquifers).

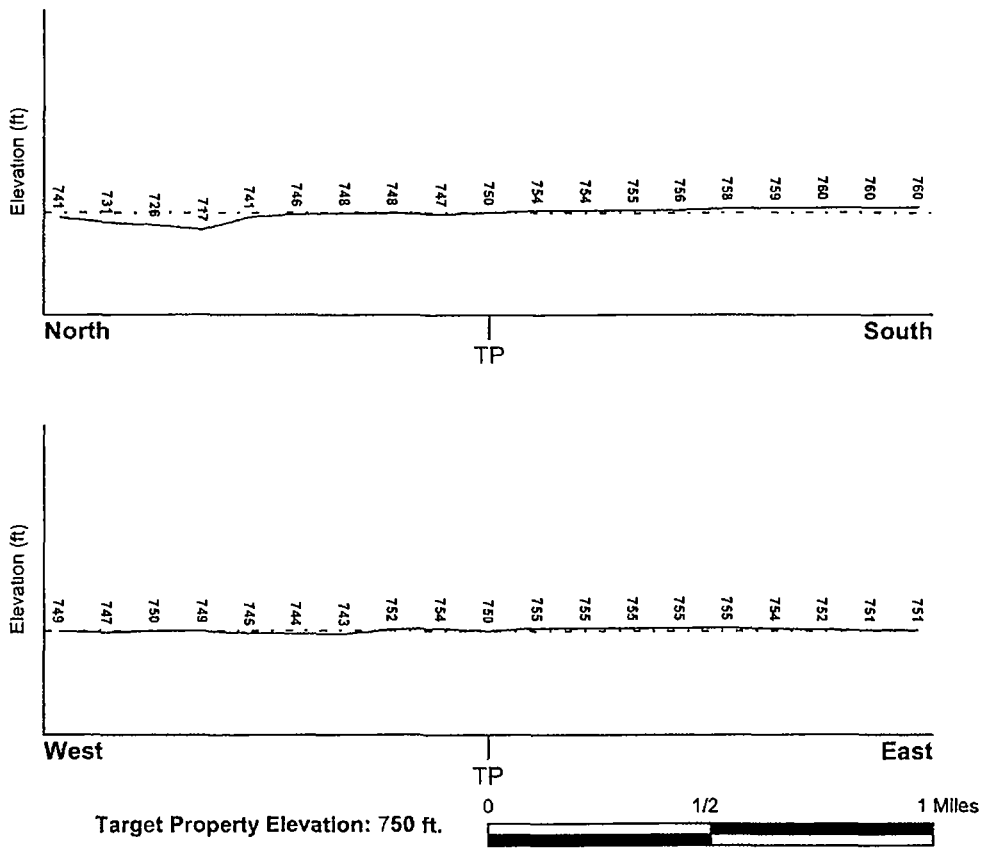
TOPOGRAPHIC INFORMATION

Surface topography may be indicative of the direction of surficial groundwater flow. This information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

TARGET PROPERTY TOPOGRAPHY

USGS Topographic Map:	41085-F8 ELKHART, IN
General Topographic Gradient:	General NW
Source:	USGS 7.5 min quad index

SURROUNDING TOPOGRAPHY: ELEVATION PROFILES



Source: Topography has been determined from the USGS 7 5' Digital Elevation Model and should be evaluated on a relative (not an absolute) basis Relative elevation information between sites of close proximity should be field verified.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

HYDROLOGIC INFORMATION

Surface water can act as a hydrologic barrier to groundwater flow Such hydrologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

Refer to the Physical Setting Source Map following this summary for hydrologic information (major waterways and bodies of water).

FEMA FLOOD ZONE

Target Property County	FEMA Flood Electronic Data
ELKHART, IN	YES - refer to the Overview Map and Detail Map
Flood Plain Panel at Target Property.	1800570010C
Additional Panels in search area:	1800560015B

NATIONAL WETLAND INVENTORY

NWI Quad at Target Property	NWI Electronic Data Coverage
ELKHART	YES - refer to the Overview Map and Detail Map

HYDROGEOLOGIC INFORMATION

Hydrogeologic information obtained by installation of wells on a specific site can often be an indicator of groundwater flow direction in the immediate area Such hydrogeologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

AQUIFLOW®

Search Radius: 1.000 Mile.

EDR has developed the AQUIFLOW Information System to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted by environmental professionals to regulatory authorities at select sites and has extracted the date of the report, groundwater flow direction as determined hydrogeologically, and the depth to water table.

MAP ID	LOCATION FROM TP	GENERAL DIRECTION GROUNDWATER FLOW
11	1/2 - 1 Mile East	NNE

For additional site information, refer to Physical Setting Source Map Findings.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

GROUNDWATER FLOW VELOCITY INFORMATION

Groundwater flow velocity information for a particular site is best determined by a qualified environmental professional using site specific geologic and soil strata data If such data are not reasonably ascertainable, it may be necessary to rely on other sources of information, including geologic age identification, rock stratigraphic unit and soil characteristics data collected on nearby properties and regional soil information. In general, contaminant plumes move more quickly through sandy-gravelly types of soils than silty-clayey types of soils.

GEOLOGIC INFORMATION IN GENERAL AREA OF TARGET PROPERTY

Geologic information can be used by the environmental professional in forming an opinion about the relative speed at which contaminant migration may be occurring.

ROCK STRATIGRAPHIC UNIT **GEOLOGIC AGE IDENTIFICATION**

Era:	Paleozoic	Category:	Stratified Sequence
System:	Mississippian		
Series:	Osagean and Kinderhookian Series		
Code:	M1 *(decoded above as Era, System & Series)*		

Geologic Age and Rock Stratigraphic Unit Source P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - a digital representation of the 1974 P.B King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

DOMINANT SOIL COMPOSITION IN GENERAL AREA OF TARGET PROPERTY

The U.S. Department of Agriculture's (USDA) Soil Conservation Service (SCS) leads the National Cooperative Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. Soil maps for STATSGO are compiled by generalizing more detailed (SSURGO) soil survey maps. The following information is based on Soil Conservation Service STATSGO data.

Soil Component Name:	KALAMAZOO
Soil Surface Texture:	loam
Hydrologic Group:	Class B - Moderate infiltration rates Deep and moderately deep, moderately well and well drained soils with moderately coarse textures.
Soil Drainage Class:	Well drained. Soils have intermediate water holding capacity. Depth to water table is more than 6 feet.

Hydric Status: Soil does not meet the requirements for a hydric soil.

Corrosion Potential - Uncoated Steel: LOW

Depth to Bedrock Min: > 60 inches

Depth to Bedrock Max: > 60 inches

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Soil Layer Information							
	Boundary			Classification			
Layer	Upper	Lower	Soil Texture Class	AASHTO Group	Unified Soil	Permeability Rate (in/hr)	Soil Reaction (pH)
1	0 inches	11 inches	loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt	Max: 2.00 Min 0.60	Max: 7 30 Min: 5 10
2	11 inches	38 inches	clay loam	Silt-Clay Materials (more than 35 pct. passing No 200), Silty Soils.	COARSE-GRAINED SOILS, Sands, Sands with fines, Clayey sand.	Max 2 00 Min: 0.60	Max. 7 30 Min 5.10
3	38 inches	55 inches	sand	Granular materials (35 pct or less passing No. 200), Silty, or Clayey Gravel and Sand.	COARSE-GRAINED SOILS, Sands, Sands with fines, Silty Sand	Max: 20.00 Min 6 00	Max 7 80 Min: 5 10
4	55 inches	60 inches	stratified	Granular materials (35 pct. or less passing No. 200), Stone Fragments, Gravel and Sand.	COARSE-GRAINED SOILS, Sands, Clean Sands, Poorly graded sand.	Max: 20.00 Min: 6 00	Max 8.40 Min: 7.40

OTHER SOIL TYPES IN AREA

Based on Soil Conservation Service STATSGO data, the following additional subordinant soil types may appear within the general area of target property.

Soil Surface Textures: sandy loam
muck
loamy sand
fine sand

Surficial Soil Types: sandy loam
muck
loamy sand
fine sand

Shallow Soil Types: sandy loam
loamy sand
sandy clay loam
gravelly - sandy clay loam
silty clay loam

Deeper Soil Types: muck
gravelly - sand
fine sand

sand
sand and gravel
mucky-peat

ADDITIONAL ENVIRONMENTAL RECORD SOURCES

According to ASTM E 1527-00, Section 7.2.2, "one or more additional state or local sources of environmental records may be checked, in the discretion of the environmental professional, to enhance and supplement federal and state sources... Factors to consider in determining which local or additional state records, if any, should be checked include (1) whether they are reasonably ascertainable, (2) whether they are sufficiently useful, accurate, and complete in light of the objective of the records review (see 7 1 1), and (3) whether they are obtained, pursuant to local, good commercial or customary practice." One of the record sources listed in Section 7.2.2 is water well information. Water well information can be used to assist the environmental professional in assessing sources that may impact groundwater flow direction, and in forming an opinion about the impact of contaminant migration on nearby drinking water wells.

WELL SEARCH DISTANCE INFORMATION

DATABASE	SEARCH DISTANCE (miles)
Federal USGS	1 000
Federal FRDS PWS	Nearest PWS within 1 mile
State Database	1 000

FEDERAL USGS WELL INFORMATION

MAP ID	WELL ID	LOCATION FROM TP
1	USGS0257812	1/4 - 1/2 Mile SSW
2	USGS0257822	1/4 - 1/2 Mile East
3	USGS0257898	1/4 - 1/2 Mile North
4	USGS0257897	1/2 - 1 Mile NE
A5	USGS0257743	1/2 - 1 Mile SE
A6	USGS0257794	1/2 - 1 Mile SE
A7	USGS0257795	1/2 - 1 Mile SE
8	USGS0257790	1/2 - 1 Mile SE
9	USGS0257793	1/2 - 1 Mile SW
B12	USGS0257760	1/2 - 1 Mile ESE
B13	USGS0257754	1/2 - 1 Mile ESE
14	USGS0257782	1/2 - 1 Mile SSW
15	USGS0257894	1/2 - 1 Mile WNW
C16	USGS0257774	1/2 - 1 Mile West
17	USGS0257818	1/2 - 1 Mile West
18	USGS0257909	1/2 - 1 Mile NNE
C19	USGS0257830	1/2 - 1 Mile West
21	USGS0257753	1/2 - 1 Mile WSW

FEDERAL FRDS PUBLIC WATER SUPPLY SYSTEM INFORMATION

MAP ID	WELL ID	LOCATION FROM TP

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

FEDERAL FRDS PUBLIC WATER SUPPLY SYSTEM INFORMATION

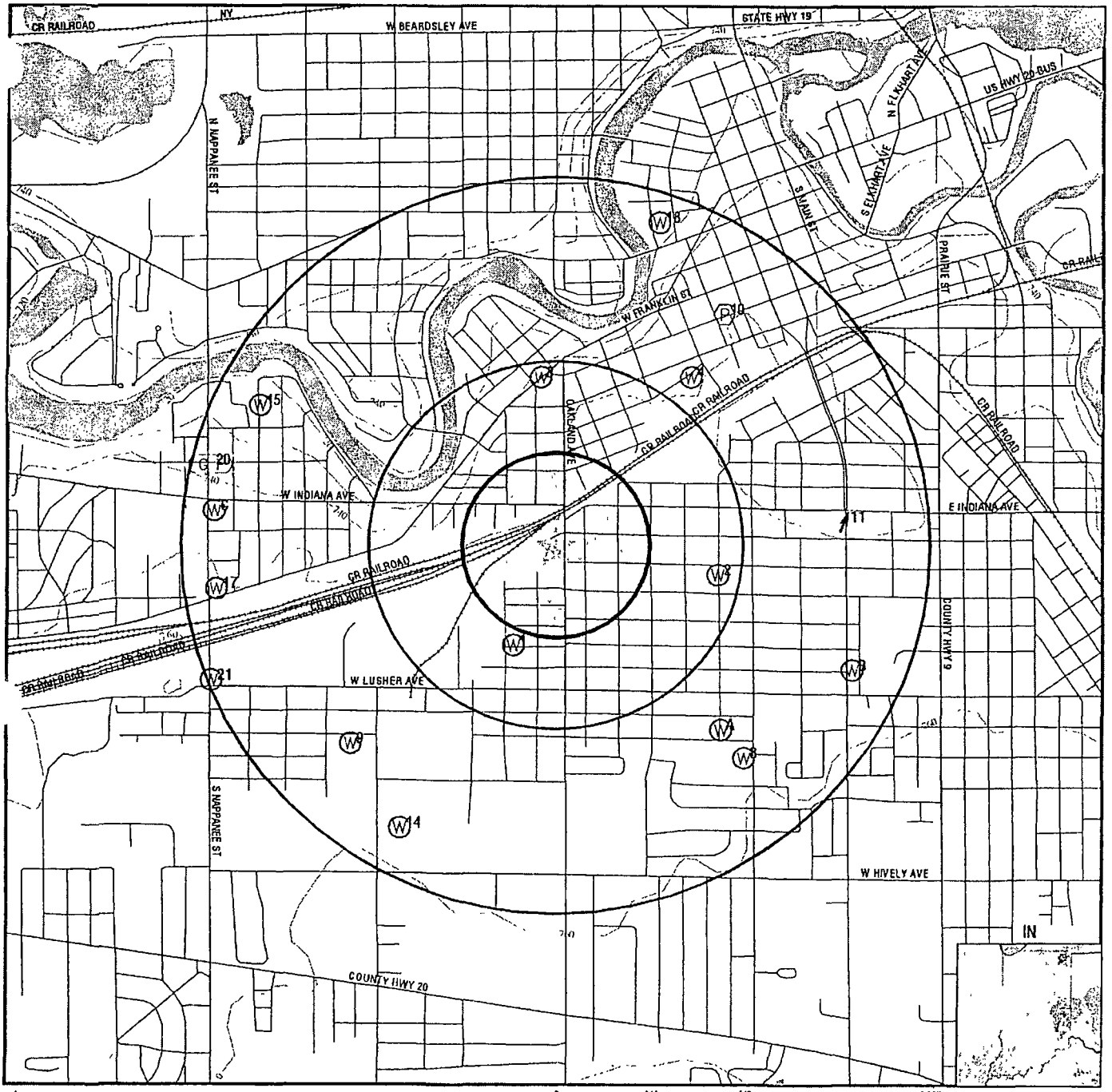
MAP ID	WELL ID	LOCATION FROM TP
10	IN2200801	1/2 - 1 Mile NE

Note PWS System location is not always the same as well location.

STATE DATABASE WELL INFORMATION

MAP ID	WELL ID	LOCATION FROM TP
No Wells Found		

PHYSICAL SETTING SOURCE MAP - 01351823.2r



- County Boundary
- Major Roads
- Contour Lines
- Earthquake epicenter, Richter 5 or greater
- Water Wells
- Public Water Supply Wells
- Cluster of Multiple Icons
- Groundwater Flow Direction
- Indeterminate Groundwater Flow at Location
- Groundwater Flow Varies at Location

TARGET PROPERTY:	Sturgin Iron and Metal	CUSTOMER:	ERM, Inc.
ADDRESS:	1631 Oakland Avenue	CONTACT:	Dan Ruslecki
CITY/STATE/ZIP:	Elkhart IN 46516	INQUIRY #:	01351823.2r
LAT/LONG:	41.6726 / 85.9853	DATE:	January 31, 2005 6:42 pm

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID
Direction
Distance
Elevation

	Database	EDR ID Number
1 **SSW** **1/4 - 1/2 Mile** **Higher**	**FED USGS**	**USGS0257812**

Agency	USEPA	Site ID.	414007085591501
Site Name.	WELL MW18 AT CONRAIL AT ELKHART		
Dec. Latitude	41.66866		
Dec. Longitude:	-85 9875		
Coord Sys·	NAD83		
State:	IN		
County:	Elkhart County		
Altitude	745.85		
Hydrologic code:	04050001		
Topographic	Not Reported		
Site Type:	Ground-water other than Spring		
Const Date	19891016	Inven Date	Not Reported
Well Type.	Single well, other than collector or Ranney type		
Primary Aquifer.	Not Reported		
Aquifer type	Not Reported		
Well depth:	19 5		
Hole depth:	21.5	Source.	logs
Project no.	Not Reported		

Ground-water levels, Number of Measurements: 1

Date	Feet below Surface	Feet to Sealevel
1989-10-16	5.4	

	Database	EDR ID Number
2 **East** **1/4 - 1/2 Mile** **Higher**	**FED USGS**	**USGS0257822**

Agency·	USEPA	Site ID·	414017085583701
Site Name	WELL MW19D AT CONRAIL AT ELKHART		
Dec Latitude	41.67144		
Dec. Longitude	-85 97694		
Coord Sys:	NAD83		
State·	IN		
County.	Elkhart County		
Altitude:	749 77		
Hydrologic code.	04050001		
Topographic:	Not Reported		
Site Type.	Ground-water other than Spring		
Const Date:	19891103	Inven Date.	Not Reported
Well Type:	Single well, other than collector or Ranney type		
Primary Aquifer.	Not Reported		
Aquifer type:	Not Reported		
Well depth·	70		
Hole depth:	71.5	Source:	logs
Project no:	Not Reported		

Ground-water levels, Number of Measurements. 0

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID
Direction
Distance
Elevation

	Database	EDR ID Number
3 **North** **1/4 - 1/2 Mile** **Lower**	**FED USGS**	**USGS0257898**

Agency	IN002	Site ID	414045085591001
Site Name	WELL F7 NEAR ELKHART T37NR5E		
Dec Latitude	41 67922		
Dec. Longitude:	-85 98611		
Coord Sys:	NAD83		
State:	IN		
County:	Elkhart County		
Altitude:	754		
Hydrologic code:	04050001		
Topographic:	Not Reported		
Site Type	Ground-water other than Spring		
Const Date	19340628	Inven Date:	19340628
Well Type	Single well, other than collector or Ranney type		
Primary Aquifer:	110QRNR		
Aquifer type:	Not Reported		
Well depth:	Not Reported		
Hole depth.	111	Source:	logs
Project no	Not Reported		

Ground-water levels, Number of Measurements 0

	Database	EDR ID Number
4 **NE** **1/2 - 1 Mile** **Higher**	**FED USGS**	**USGS0257897**

Agency	USEPA	Site ID:	414045085584201
Site Name	WELL MW20D AT CONRAIL AT ELKHART IN		
Dec. Latitude	41.67922		
Dec. Longitude:	-85 97833		
Coord Sys	NAD83		
State:	IN		
County:	Elkhart County		
Altitude:	748.41		
Hydrologic code.	04050001		
Topographic:	Not Reported		
Site Type	Ground-water other than Spring		
Const Date:	19891013	Inven Date	Not Reported
Well Type	Single well, other than collector or Ranney type		
Primary Aquifer	Not Reported		
Aquifer type:	Not Reported		
Well depth:	81		
Hole depth:	81 5	Source:	logs
Project no.	Not Reported		

Ground-water levels, Number of Measurements: 0

	Database	EDR ID Number
A5 **SE** **1/2 - 1 Mile** **Higher**	**FED USGS**	**USGS0257743**

GEOCHECK®- PHYSICAL SETTING SOURCE MAP FINDINGS

Agency:	USEPA	Site ID:	413957085583701
Site Name:	WELL MW16 AT CONRAIL AT ELKHART IN		
Dec Latitude.	41 66588		
Dec. Longitude:	-85.97694		
Coord Sys:	NAD83		
State.	IN		
County·	Elkhart County		
Altitude·	741 11		
Hydrologic code.	04050001		
Topographic.	Not Reported		
Site Type:	Ground-water other than Spring		
Const Date:	19891012	Inven Date	Not Reported
Well Type:	Single well, other than collector or Ranney type		
Primary Aquifer:	Not Reported		
Aquifer type.	Not Reported		
Well depth:	24.5		
Hole depth	26 5	Source:	logs
Project no·	Not Reported		

Ground-water levels, Number of Measurements: 1

Date	Feet below Surface	Feet to Sealevel
1989-10-12	3 4	

A6
SE
1/2 - 1 Mile
Higher

FED USGS **USGS0257794**

Agency:	USGS	Site ID:	413954085583601
Site Name·	USGS ELKHART WELL 15S 2 INCH STEEL 24 FT		
Dec. Latitude.	41 66505		
Dec. Longitude:	-85.97667		
Coord Sys:	NAD83		
State·	IN		
County:	Elkhart County		
Altitude:	760		
Hydrologic code	04050001		
Topographic:	Not Reported		
Site Type.	Ground-water other than Spring		
Const Date:	19771006	Inven Date:	Not Reported
Well Type·	Single well, other than collector or Ranney type		
Primary Aquifer:	112OTWS		
Aquifer type·	Unconfined single aquifer		
Well depth:	24		
Hole depth:	27	Source:	driller
Project no:	Not Reported		

Ground-water levels, Number of Measurements: 24

Date	Feet below Surface	Feet to Sealevel	Date	Feet below Surface	Feet to Sealevel
1992-04-23	13.38		1991-10-31	13.91	
1991-04-12	12 22		1990-10-04	13 83	
1990-04-23	13.54		1989-10-17	18.80	
1989-04-20	18 40		1988-10-12	20.20	
1988-03-28	19.60		1987-10-20	19 70	
1987-04-27	18.80		1986-09-30	18 30	

Ground-water levels, continued.

Date	Feet below Surface	Feet to Sealevel	Date	Feet below Surface	Feet to Sealevel
1986-04-17	17.90		1985-11-11	19 00	
1985-04-11	16 60		1984-10-25	18.00	
1984-04-18	17.80		1983-10-26	18.10	
1983-04-18	16 80		1982-05-03	16 30	
1981-09-17	15 50		1981-05-13	16.90	
1980-12-11	17.40				
1977-10-06	16.49				

Note: The site had been pumped recently.

A7
SE
1/2 - 1 Mile
Higher

FED USGS **USGS0257795**

Agency.	USGS	Site ID	413954085583602
Site Name.	USGS ELKHART WELL 15D AT ELKHART IN		
Dec. Latitude:	41 66505		
Dec. Longitude	-85.97667		
Coord Sys:	NAD83		
State:	IN		
County·	Elkhart County		
Altitude	758		
Hydrologic code	04050001		
Topographic·	Not Reported		
Site Type	Ground-water other than Spring		
Const Date·	19781128	Inven Date·	Not Reported
Well Type:	Single well, other than collector or Ranney type		
Primary Aquifer·	112OTWS		
Aquifer type:	Unconfined single aquifer		
Well depth:	151		
Hole depth:	166	Source·	driller
Project no:	Not Reported		

Ground-water levels, Number of Measurements. 19

Date	Feet below Surface	Feet to Sealevel	Date	Feet below Surface	Feet to Sealevel
1989-10-17	16.80		1989-04-20	16.50	
1988-10-12	18 30		1988-03-28	17.60	
1987-10-20	17.80		1987-04-27	16 10	
1986-10-01	16 30		1986-04-17	15.90	
1985-11-11	17.00		1985-04-11	14 40	
1984-10-25	16.00		1984-04-18	16.20	
1983-10-26	16.60		1983-04-18	14 70	
1982-05-03	14.30		1981-09-17	13.50	
1981-05-13	14.90		1980-12-11	15 40	
1978-11-28	16				

8
SE
1/2 - 1 Mile
Higher

FED USGS **USGS0257790**

Agency:	USEPA	Site ID	413951085583201
Site Name:	BORING PB21 AT CONRAIL AT ELKHART IN		
Dec. Latitude.	41 66422		
Dec Longitude	-85 97556		
Coord Sys:	NAD83		
State:	IN		
County	Elkhart County		
Altitude:	752 37		
Hydrologic code:	04050001		
Topographic	Hillside (slope)		
Site Type:	Ground-water other than Spring		
Const Date:	19891009	Inven Date	Not Reported
Well Type.	Test hole, not completed as a well		
Primary Aquifer:	Not Reported		
Aquifer type	Not Reported		
Well depth:	Not Reported		
Hole depth:	130 5	Source	driller
Project no:	Not Reported		

Ground-water levels, Number of Measurements: 0

9
SW
1/2 - 1 Mile
Higher

FED USGS **USGS0257793**

Agency:	IN002	Site ID:	413953085594501
Site Name:	WELL B32 T37NR5E AT ELKHART (GEMEIN. ERT WELL 14-1		
Dec. Latitude.	41 66477		
Dec Longitude.	-85 99583		
Coord Sys:	NAD83		
State:	IN		
County:	Elkhart County		
Altitude:	754 56		
Hydrologic code.	04050001		
Topographic:	Not Reported		
Site Type:	Ground-water other than Spring		
Const Date	19871104	Inven Date	Not Reported
Well Type:	Single well, other than collector or Ranney type		
Primary Aquifer:	112OTWS		
Aquifer type.	Unconfined single aquifer		
Well depth	35		
Hole depth:	38	Source.	driller
Project no:	Not Reported		

Ground-water levels, Number of Measurements: 1

Date	Feet below Surface	Feet to Sealevel
1987-11-04	16.96	

10
NE
1/2 - 1 Mile
Higher

FRDS PWS **IN2200801**

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

PWS ID:	IN2200801	PWS Status:	Active
Date Initiated:	7601	Date Deactivated:	Not Reported
PWS Name:	CONCORD MALL STUART LANDERMAN 3701 SOUTH MAIN STREET ELKHART, IN 46517		
Addressee / Facility:	Not Reported		
Facility Latitude:	41 40 54	Facility Longitude:	085 58 36
City Served:	DALEVILLE		
Treatment Class:	Treated	Population:	00000025

PWS currently has or had major violation(s) or enforcement: Yes

VIOLATIONS INFORMATION:

Violation ID:	93V0001	Source ID.	Not Reported	PWS Phone	Not Reported
Vio beginning Date:	01/01/93	Vio. end Date:	12/31/93	Vio Period:	012 Months
Num required Samples:	Not Reported	Number of Samples Taken.		000	
Analysis Result:	Not Reported	Maximum Contaminant Level:		Not Reported	
Analysis Method:	Not Reported				
Violation Type:	Monitoring, Regular				
Contaminant:	NITRATE				
Vio. Awareness Date:	Not Reported				

ENFORCEMENT INFORMATION:

System Name	CONCORD MALL		
Violation Type:	Monitoring, Routine Major (TCR)		
Contaminant	COLIFORM (TCR)		
Compliance Period.	1995-07-01 - 1995-09-30	Analytical Value:	00000000.00
Violation ID.	9500001V	Enforcement ID.	9500001E
Enforcement Date:	1995-11-03	Enf. Action	State Public Notif Requested

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11
East
1/2 - 1 Mile
Lower

Site ID:	19568	**AQUIFLOW**	**4221**
Groundwater Flow:	NNE		
Water Table Depth.	8-9		
Date	Mar-91		

B12
ESE
1/2 - 1 Mile
Higher

FED USGS **USGS0257760**

Agency:	IN002	Site ID:	414004085581201
Site Name.	WELL A13 T37NR5E AT ELKHART		
Dec. Latitude.	41.66783		
Dec. Longitude:	-85.97		
Coord Sys:	NAD83		
State	IN		
County:	Elkhart County		
Altitude:	755		
Hydrologic code.	04050001		
Topographic:	Not Reported		
Site Type:	Ground-water other than Spring		
Const Date:	19610823	Inven Date.	19610823
Well Type:	Single well, other than collector or Ranney type		

Primary Aquifer:	110QRNR		
Aquifer type	Unconfined single aquifer		
Well depth:	59		
Hole depth:	59	Source:	logs
Project no:	Not Reported		

Ground-water levels, Number of Measurements. 1

Date	Feet below Surface	Feet to Sealevel
1961-08-23	16	

B13
ESE
1/2 - 1 Mile
Higher

FED USGS **USGS0257754**

Agency:	IN002	Site ID	414003085581201
Site Name:	WELL 32 T37NR5E AT ELKHART		
Dec. Latitude:	41.66755		
Dec. Longitude	-85.97		
Coord Sys:	NAD83		
State:	IN		
County:	Elkhart County		
Altitude:	755		
Hydrologic code:	04050001		
Topographic:	Not Reported		
Site Type:	Ground-water other than Spring		
Const Date:	19610823	Inven Date.	19610823
Well Type:	Single well, other than collector or Ranney type		
Primary Aquifer:	110QRNR		
Aquifer type	Confined single aquifer		
Well depth:	118		
Hole depth:	118	Source:	logs
Project no:	Not Reported		

Ground-water levels, Number of Measurements: 1

Date	Feet below Surface	Feet to Sealevel
1961-08-23	14	

14
SSW
1/2 - 1 Mile
Higher

FED USGS **USGS0257782**

Agency:	IN002	Site ID:	413941085593601
Site Name:	WELL 75 T37NR5E AT ELKHART		
Dec. Latitude:	41.66144		
Dec. Longitude:	-85.99333		
Coord Sys:	NAD83		
State:	IN		
County:	Elkhart County		
Altitude.	755		
Hydrologic code:	04050001		
Topographic:	Not Reported		
Site Type:	Ground-water other than Spring		
Const Date:	19591130	Inven Date:	19591130
Well Type	Single well, other than collector or Ranney type		

Primary Aquifer:	110QRNR		
Aquifer type	Unconfined single aquifer		
Well depth:	89		
Hole depth	89	Source:	logs
Project no:	Not Reported		

Ground-water levels, Number of Measurements 1

Date	Feet below Surface	Feet to Sealevel
1959-11-30	14	

15
WNW
1/2 - 1 Mile
Lower

FED USGS **USGS0257894**

Agency:	IN002	Site ID:	414041086000201
Site Name:	WELL F37 T37NR5E AT ELKHART IN		
Dec. Latitude:	41.6781		
Dec. Longitude.	-86 00056		
Coord Sys:	NAD83		
State	IN		
County:	Elkhart County		
Altitude:	726		
Hydrologic code:	04050001		
Topographic:	Not Reported		
Site Type	Ground-water other than Spring		
Const Date:	19781102	Inven Date	Not Reported
Well Type	Single well, other than collector or Ranney type		
Primary Aquifer:	112OTWS		
Aquifer type:	Not Reported		
Well depth.	103		
Hole depth	103	Source:	driller
Project no.	Not Reported		

Ground-water levels, Number of Measurements: 1

Date	Feet below Surface	Feet to Sealevel
1978-11-02	5	

C16
West
1/2 - 1 Mile
Higher

FED USGS **USGS0257774**

Agency:	IN002	Site ID	414025086001001
Site Name:	WELL A12 T37NR5E AT ELKHART		
Dec. Latitude:	41.67366		
Dec. Longitude:	-86 00278		
Coord Sys:	NAD83		
State	IN		
County:	Elkhart County		
Altitude:	745		
Hydrologic code:	04050001		
Topographic:	Not Reported		
Site Type:	Ground-water other than Spring		
Const Date:	19630601	Inven Date.	19630601
Well Type	Single well, other than collector or Ranney type		

Primary Aquifer:	110QRNR		
Aquifer type	Confined single aquifer		
Well depth:	53		
Hole depth	53	Source:	logs
Project no:	Not Reported		

Ground-water levels, Number of Measurements: 1

Date	Feet below Surface	Feet to Sealevel
1963-06-01	16.5	

17
West
1/2 - 1 Mile
Higher

FED USGS **USGS0257818**

Agency:	IN002	Site ID	414015086001001
Site Name:	WELL A11 T37NR5E AT ELKHART		
Dec. Latitude	41.67088		
Dec. Longitude:	-86.00278		
Coord Sys.	NAD83		
State:	IN		
County	Elkhart County		
Altitude.	755		
Hydrologic code	04050001		
Topographic	Not Reported		
Site Type:	Ground-water other than Spring		
Const Date:	19740802	Inven Date.	19740802
Well Type:	Single well, other than collector or Ranney type		
Primary Aquifer.	110QRNR		
Aquifer type	Confined single aquifer		
Well depth:	102		
Hole depth:	102	Source.	logs
Project no:	Not Reported		

Ground-water levels, Number of Measurements: 1

Date	Feet below Surface	Feet to Sealevel
1974-08-02	4	

18
NNE
1/2 - 1 Mile
Lower

FED USGS **USGS0257909**

Agency:	IN002	Site ID.	414107085584801
Site Name:	WELL 19 T37NR5E AT ELKHART		
Dec Latitude	41.68533		
Dec. Longitude:	-85.98		
Coord Sys:	NAD83		
State:	IN		
County.	Elkhart County		
Altitude:	725		
Hydrologic code:	04050001		
Topographic:	Not Reported		
Site Type:	Ground-water other than Spring		
Const Date	19650726	Inven Date:	19650726
Well Type:	Single well, other than collector or Ranney type		

Primary Aquifer:	110QRNR		
Aquifer type:	Confined single aquifer		
Well depth:	75		
Hole depth:	75	Source:	logs
Project no:	Not Reported		

Ground-water levels, Number of Measurements: 1

Date	Feet below Surface	Feet to Sealevel
1965-07-26	3	3

C19
West
1/2 - 1 Mile
Lower

FED USGS **USGS0257830**

Agency	IN002	Site ID:	414027086001101
Site Name:	WELL A10 T37NR5E AT ELKHART		
Dec. Latitude:	41 67422		
Dec. Longitude.	-86 00306		
Coord Sys:	NAD83		
State:	IN		
County:	Elkhart County		
Altitude:	740		
Hydrologic code:	04050001		
Topographic:	Not Reported		
Site Type.	Ground-water other than Spring		
Const Date:	19760203	Inven Date	19760203
Well Type:	Single well, other than collector or Ranney type		
Primary Aquifer:	110QRNR		
Aquifer type:	Confined single aquifer		
Well depth:	58		
Hole depth:	58	Source:	logs
Project no:	Not Reported		

Ground-water levels, Number of Measurements: 1

Date	Feet below Surface	Feet to Sealevel
1976-02-03	15	

20
WNW
1/2 - 1 Mile
Lower

Site ID.	15134
Groundwater Flow:	NOT REPORTED
Water Table Depth:	10.71-12.43
Date:	Jan-98

AQUIFLOW **4210**

21
WSW
1/2 - 1 Mile
Higher

FED USGS **USGS0257753**

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

Agency:	IN002	Site ID:	414002086001101
Site Name.	WELL A9 T37NR5E ELKHART		
Dec Latitude.	41.66727		
Dec Longitude	-86 00306		
Coord Sys:	NAD83		
State	IN		
County	Elkhart County		
Altitude:	752		
Hydrologic code	04050001		
Topographic.	Not Reported		
Site Type:	Ground-water other than Spring		
Const Date:	19651210	Inven Date:	19651210
Well Type	Single well, other than collector or Ranney type		
Primary Aquifer	110QRNR		
Aquifer type.	Not Reported		
Well depth	45		
Hole depth:	45	Source:	logs
Project no	Not Reported		

Ground-water levels, Number of Measurements 1

Date	Feet below Surface	Feet to Sealevel
1965-12-10	18	

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS
RADON

AREA RADON INFORMATION

State Database: IN Radon

Radon Test Results

City	County	Zip	Result
ELKHART	ELKHART	46516	5.099999904632568
ELKHART	ELKHART	46516	9.300000190734863
ELKHART	ELKHART	46516	7.800000190734863
ELKHART	ELKHART	46516	8.600000381469727
ELKHART	ELKHART	46516	11.80000019073486
ELKHART	ELKHART	46516	11.89999961853027
ELKHART	ELKHART	46516	0.200000002980232
ELKHART	ELKHART	46516	0
ELKHART	ELKHART	46516	6 400000095367432
ELKHART	ELKHART	46516	6.5
ELKHART	ELKHART	46516	8.800000190734863
ELKHART	ELKHART	46516	10 89999961853027
ELKHART	ELKHART	46516	2.299999952316284
ELKHART	ELKHART	46516	1 100000023841858
ELKHART	ELKHART	46516	4 099999904632568
ELKHART	ELKHART	46516	0.300000011920929
ELKHART	ELKHART	46516	4.800000190734863
ELKHART	ELKHART	46516	2.099999904632568
ELKHART	ELKHART	46516	3 400000095367432
ELKHART	ELKHART	46516	2 099999904632568
ELKHART	ELKHART	46516	1 600000023841858
ELKHART	ELKHART	46516	2.599999904632568
ELKHART	ELKHART	46516	3 599999904632568
ELKHART	ELKHART	46516	3 799999952316284
ELKHART	ELKHART	46516	1.100000023841858
ELKHART	ELKHART	46516	2 099999904632568
ELKHART	ELKHART	46516	3 299999952316284
ELKHART	ELKHART	46516	0 899999976158142
ELKHART	ELKHART	46516	1.700000047683716
ELKHART	ELKHART	46516	0 899999976158142
ELKHART	ELKHART	46516	3 099999904632568
CULVER		46516	1.600000023841858
CULVER	MARSHALL	46516	1 600000023841858
CULVER	MARSHALL	46516	2 299999952316284
CULVER	MARSHALL	46516	2 400000095367432
CULVER	MARSHALL	46516	1.799999952316284
CULVER	MARSHALL	46516	4 800000190734863
CULVER	MARSHALL	46516	1.899999976158142
BURKET	KOSCIUSCO	46516	1.299999952316284
BRISTOL	SULLIVAN	46516	0.5
MIDDLEBURY	ELKHART	46516	2 099999904632568
BRISTOL	SULLIVAN	46516	6.900000095367432
BRISTOL	SULLIVAN	46516	57.40000152587891
BRISTOL	SULLIVAN	46516	1 399999976158142
BRISTOL	SULLIVAN	46516	10.80000019073486
BRISTOL	SULLIVAN	46516	3.299999952316284
BRISTOL			

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS
RADON

AREA RADON INFORMATION

	SULLIVAN	46516	3 599999904632568
BRISTOL	SULLIVAN	46516	3.099999904632568
BRISTOL	SULLIVAN	46516	1.200000047683716
BRISTOL	SULLIVAN	46516	2 099999904632568
BRISTOL		46516	0.600000023841858
BRISTOL		46516	0
BRISTOL	ELKHART	46516	2 099999904632568
BRISTOL	ELKHART	46516	3 099999904632568
BRISTOL		46516	0 600000023841858
BRISTOL		46516	3.5
BRISTOL	ELKHART	46516	1 299999952316284
BRISTOL	ELKHART	46516	0 600000023841858
BRISTOL	ELKHART	46516	1 299999952316284
BRISTOL	ELKHART	46516	0 400000005960465
BRISTOL		46516	3 299999952316284
BRISTOL		46516	9 399999618530273
BRISTOL	ELKHART	46516	1
BRISTOL	ELKHART	46516	2 299999952316284

Federal EPA Radon Zone for ELKHART County. 1

Note: Zone 1 indoor average level > 4 pCi/L
: Zone 2 indoor average level >= 2 pCi/L and <= 4 pCi/L.
Zone 3 indoor average level < 2 pCi/L.

Federal Area Radon Information for Zip Code: 46516

Number of sites tested: 9

Area	Average Activity	% <4 pCi/L	% 4-20 pCi/L	% >20 pCi/L
Living Area - 1st Floor	1 650 pCi/L	100%	0%	0%
Living Area - 2nd Floor	Not Reported	Not Reported	Not Reported	Not Reported
Basement	5 156 pCi/L	56%	44%	0%

PHYSICAL SETTING SOURCE RECORDS SEARCHED

TOPOGRAPHIC INFORMATION

USGS 7.5' Digital Elevation Model (DEM)
Source: United States Geologic Survey
EDR acquired the USGS 7 5' Digital Elevation Model in 2002 7.5-Minute DEMs correspond to the USGS 1:24,000- and 1 25,000-scale topographic quadrangle maps.

HYDROLOGIC INFORMATION

Flood Zone Data: This data, available in select counties across the country, was obtained by EDR in 1999 from the Federal Emergency Management Agency (FEMA). Data depicts 100-year and 500-year flood zones as defined by FEMA.

NWI: National Wetlands Inventory This data, available in select counties across the country, was obtained by EDR in 2002 from the U S. Fish and Wildlife Service

HYDROGEOLOGIC INFORMATION

AQUIFLOW^R Information System
Source EDR proprietary database of groundwater flow information
EDR has developed the AQUIFLOW Information System (AIS) to provide data on the general direction of groundwater flow at specific points EDR has reviewed reports submitted to regulatory authorities at select sites and has extracted the date of the report, hydrogeologically determined groundwater flow direction and depth to water table information.

GEOLOGIC INFORMATION

Geologic Age and Rock Stratigraphic Unit
Source P G Schruben, R.E. Arndt and W J. Bawiec, Geology of the Conterminous U.S. at 1 2,500,000 Scale - A digital representation of the 1974 P.B King and H.M Beikman Map, USGS Digital Data Series DDS - 11 (1994)

STATSGO: State Soil Geographic Database
Source. Department of Agriculture, Natural Resources Conservation Services
The U S. Department of Agriculture's (USDA) Natural Resources Conservation Service (NRCS) leads the national Conservation Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. Soil maps for STATSGO are compiled by generalizing more detailed (SSURGO) soil survey maps.

ADDITIONAL ENVIRONMENTAL RECORD SOURCES

FEDERAL WATER WELLS

PWS: Public Water Systems
Source· EPA/Office of Drinking Water
Telephone: 202-564-3750
Public Water System data from the Federal Reporting Data System A PWS is any water system which provides water to at least 25 people for at least 60 days annually. PWSs provide water from wells, rivers and other sources.

PWS ENF: Public Water Systems Violation and Enforcement Data
Source: EPA/Office of Drinking Water
Telephone· 202-564-3750
Violation and Enforcement data for Public Water Systems from the Safe Drinking Water Information System (SDWIS) after August 1995. Prior to August 1995, the data came from the Federal Reporting Data System (FRDS)

USGS Water Wells: USGS National Water Inventory System (NWIS)
This database contains descriptive information on sites where the USGS collects or has collected data on surface water and/or groundwater. The groundwater data includes information on wells, springs, and other sources of groundwater

PHYSICAL SETTING SOURCE RECORDS SEARCHED

STATE RECORDS

Public Water Supply Wells
Source: Department of Environmental Management
Telephone: 317-308-3323
Community and non-community drinking water wells.

RADON

State Database: IN Radon
Source: Department of Health
Telephone 317-233-7148
Radon Test Results

Area Radon Information
Source: USGS
Telephone 703-356-4020
The National Radon Database has been developed by the U.S. Environmental Protection Agency (USEPA) and is a compilation of the EPA/State Residential Radon Survey and the National Residential Radon Survey The study covers the years 1986 - 1992. Where necessary data has been supplemented by information collected at private sources such as universities and research institutions.

EPA Radon Zones
Source: EPA
Telephone: 703-356-4020
Sections 307 & 309 of IRAA directed EPA to list and identify areas of U.S. with the potential for elevated indoor radon levels.

OTHER

Airport Landing Facilities: Private and public use landing facilities
Source: Federal Aviation Administration, 800-457-6656

Epicenters: World earthquake epicenters, Richter 5 or greater
Source. Department of Commerce, National Oceanic and Atmospheric Administration

Date EDR Searched Historical Sources:
City Directories Feb 02, 2005

Target Property:
1631 Oakland Avenue
Elkhart, IN 46516

PUR ID Year	*Uses*	*NAICS*	*Source*
1945	Address not Listed in Research Source	N/A	Polk City Directory
1959	Address not Listed in Research Source	N/A	Polk City Directory
1964	Address not Listed in Research Source	N/A	Polk City Directory
1969	Address not Listed in Research Source	N/A	Polk City Directory
1974	Address not Listed in Research Source	N/A	Polk City Directory
1979	Address not Listed in Research Source	N/A	Polk City Directory
1983	Address not Listed in Research Source	N/A	Polk City Directory
1988	Draggoo Electric Co		Polk City Directory
1993	Draggoo Group Inc		Polk City Directory
1998	Anew Company		Polk City Directory
2003	Anewco		Polk City Directory

Adjoining Properties

SURROUNDING
Multiple Addresses
Elkhart, IN 46516

PUR ID Year	*Uses*	*NAICS*	*Source*
1945	**OAKLAND AVE**		Polk City Directory
	Vacant (1613)	N/A	
	Residence (1614)		
	Address not listed in research source (1629)	N/A	
	Residence (1701)		
	Residence (1703)		
	Residence (1707)		
	Residence (1711)		
	Abbott's Grocery (1712)		
	Residence (1715)		
1959	**OAKLAND AVE**		Polk City Directory
	Residence (1614)		

PUR ID Year	Uses	NAICS	Source
1959 (continued)			
	Elkhart Rubber Works Inc (1629)		
	Residence (1701)		
	Vacant (1703)	N/A	
	Residence (1707)		
	Residence (1711)		
	Oakland Avenue Grocery (1712)		
	Residence (1715)		
	-No other addresses within range		
1964	**OAKLAND AVE**		Polk City Directory
	Residence (1614)		
	Elkhart Rubber Works Inc (1629)		
	Residence (1701)		
	Residence (1707)		
	Residence (1711)		
	Nancy's Burger Store (1712)		
	Residence (1715)		
	-No other addresses within range		
1969	**OAKLAND AVE**		Polk City Directory
	Paul Willis, Trucker (1614)		
	Elkhart Rubber Works Inc (1629)		
	Residence (1701)		
	Residence (1707)		
	Residence (1711)		
	Oakland Food Mart (1712)		
	Residence (1715)		
	-No other addresses within range		
1974	**OAKLAND AVE**		Polk City Directory
	Paul Willis, Trucker (1614)		
	Elkhart Rubber Works Inc (1629)		
	Residence (1707)		
	Vacant (1711)	N/A	
	Rixter's Grocery (1712)		
	Residence (1715)		
	-No other addresses within range		
1979	**OAKLAND AVE**		Polk City Directory
	Paul Willis, Trucker (1614)		
	Elkhart Rubber Works Inc (1629)		
	Anchor Packing Co (1629)		

City of Elkhart

The city with a heart

February 16, 2005

Dan Rusiecki
Environmental Resources Management
3352 128th Avenue
Holland, MI 49424

Dear Mr. Rusiecki:

Enclosed you will find the following files for ANEWCO as per your February 11th request:

- The latest Industrial Wastewater Discharge Permit
- Two Enforcement Actions
- Sampling results (11/1/00 – 7/2/03) – Note the parameter limits listed at the top of sheet

Sincerely,

Greg Koehler
Pretreatment Coordinator

David L. Miller
Mayor

Public Works
& Utilities

Administration
1201 S. Nappanee Street
Elkhart, Indiana 46516
Phone: 574 293 2572
Fax: 574 293 7658

Customer Billing
921 N. Main Street
Elkhart, Indiana 46514
Phone: 574 264 4273
Fax: 574 206 8963

Board Of Public Works
229 S. Second Street
Elkhart, Indiana 46516
Phone: 574 294 5471
Fax: 574 293.7964

CITY OF ELKHART
PUBLIC WORKS & UTILITIES ADMINISTRATION
1201 S. Nappanee Street
Elkhart, Indiana 46516

INDUSTRIAL WASTEWATER DISCHARGE PERMIT
Permit No. 97-01

In compliance with the provisions the City of Elkhart Sewer Use and Rate Ordinance No. 4187, as amended,

ANEW COMPANY, INC.
1631 Oakland Avenue
Elkhart, Indiana 46516
(574) 293-9088

is hereby authorized to discharge industrial wastewater from the above identified facility and through the outfalls identified herein into the City of Elkhart sewer system in accordance with the conditions set forth in this permit. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all applicable pretreatment regulations, standards or requirements under local, State, and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit. Nothing in this permit shall be construed to relieve the permittee from liabilities and administrative, civil or criminal penalties resulting from noncompliance with this permit or the City of Elkhart Sewer Use and Rate Ordinance No. 4187, as amended and Ordinance 4653.

Noncompliance with any term or condition of this permit shall constitute a violation of the City of Elkhart Sewer Use and Rate Ordinance No. 4187.

This permit incorporates the City of Elkhart Sewer Use and Rate Ordinance No. 4187 and the City of Elkhart Enforcement Response Plan. Anything not covered specifically by this permit shall be referred to the City of Elkhart Sewer Use and Rate Ordinance No. 4187 and the City of Elkhart Enforcement Response Plan. No exceptions will be implied and must be expressly stated.

EFFECTIVE DATE: **July 1, 2003**

EXPIRATION DATE: **July 1, 2008**

PART I. FACILITY DESCRIPTION

ANEW Company, Inc., is located at 1631 Oakland Avenue, Elkhart, Indiana. It is subject to the National Categorical Pretreatment Standards for the Metal Finishing Point Source Category, as listed in 40 CFR Part 433.17. More specifically, it is subject to Subpart A - Metal Finishing Subcategory, as a new source, therefore subject to Pretreatment Standards for New Sources (PSNS). The primary metal finishing operations are chemical etching on glass and mirrors.

The manufacturing process includes chemical etching of copper and silver. Wastewater is generated from rinses after cleaning and etching of mirror backing containing copper and silver. Operations are performed three to four hours per day, five days a week, at a rate of 800 gallons per day (gpd). The sanitary wastewater discharge is of 200 gallons per day and enters the sewer system combined with the process wastewater. A control manhole is present and identified on the diagram included in this permit.

PART II. EFFLUENT LIMITATIONS

A. During the period of **July 1, 2003 to July 1, 2008** permittee is authorized to discharge wastewater to the City of Elkhart sewer system through the control manhole located in the front of the building, on Oakland Avenue. The discharge includes sanitary and process water.

B. During the period **July 1, 2003 to July 1, 2008** the discharges of wastewaters shall not exceed the limits set fourth in this permit.

C. The following limits apply to **end of process wastewaters** discharged to the sewer system before they commingle with sanitary and/or other exempted or unregulated wastewaters:

PART III. SELF MONITORING REQUIREMENTS

A. From the period beginning on **July 1, 2003** to **July 1, 2008 the permittee shall monitor at the END OF PROCESS** for the following parameters, at the indicated frequency:

PARAMETER	FREQUENCY	SAMPLE TYPE[5]
pH	every three months	Grab[6]
Copper	every three months	one day's composite
Silver	every three months	one day's composite
Zinc	every three months	one day's composite
Cadmium	every six months	one day's composite
Chromium	every six months	one day's composite
Lead	every six months	one day's composite
Nickel	every six months	one day's composite
Cyanide (T)	every six months	Grab
TTO	every six months	Grab

B. A Grab sample is defined as an individual sample collected over a period of time not to exceed 15 minutes.

C. For this application, a composite sample is interpreted to be a minimum of four grab samples collected at equal intervals, collecting identical volumes, over the period of the work day. Upon review, the Pretreatment Office may increase the number of grab samples to be collected. The sample volume will depend on the number of analyses to be performed by the analytical laboratory. Alternative methods may be submitted for approval and must demonstrate to be representative of discharge.

PART IV. REPORTING

A. Self-monitoring sampling results from sampling conducted in a calendar month shall be summarized and reported to the Pretreatment Office in the following

[5] Samples are to be taken in accordance with 40 CFR Part 136 and amendments thereto, according to the City of Elkhart Sewer Use and Rate Ordinance, Section 3.5.1, unless specified otherwise in this permit.

[6] In a grab sample, pH must be taken within thirty minutes following collection of sample. If a continuous measurement is done, calibration data must be submitted to the Pretreatment Office with monitoring report. No pH taken from composite samples will be accepted.

F. If TTO reporting is required, it shall be performed according to instructions provided in the Forms section of this Permit. The instructions and required Certification Statement are included.

G. All reports shall include all proper signatures according to the City of Elkhart's Sewer Use and Rate Ordinance No. 4187, Section 3.3.4, as amended.

H. Notification and resampling shall be conducted in accordance with the City of Elkhart Sewer Use and Rate Ordinance No. 4187, Section 3.3.1, as amended.

PART V. POTW MONITORING AND INSPECTIONS

All POTW monitoring and inspections will be performed according to the City of Elkhart Sewer Use and Rate Ordinance No. 4187, Article VIII.

PART VI. NONCOMPLIANCE AND ENFORCEMENT

All noncompliance and enforcement action determinations will be made according to the City of Elkhart Sewer Use and Rate Ordinance No.4187 and the City of Elkhart Enforcement Response Plan.

PART VII. STANDARD CONDITIONS AND PROHIBITIONS

All conditions and prohibitions contained in the City of Elkhart Sewer Use and Rate Ordinance No. 4187, as amended, shall be incorporated in this permit by reference, and any violations of any such conditions shall constitute violation of this permit.

PART VIII. REOPENER CLAUSE

This permit may be reopened and modified in accordance with the City of Elkhart Sewer Use and Rate Ordinance No. 4187, Section 3.2.3, as amended

PART IX. ANNUAL PUBLICATION

Annual publication of significant noncompliance will be conducted in accordance with the City of Elkhart Sewer Use and Rate Ordinance No. 4187, Section 4.6, as amended, and the City of Elkhart Enforcement Response Plan.

PART XVI. NOTICE OF PERMIT REVOCATION

This permit may be revoked pursuant to permittee noncompliance in accordance with the City of Elkhart Sewer Use and Rate Ordinance No. 4187, Section 4.2, as amended.

PART XVII. SEVERABILITY

If any provisions, paragraph, word, section or article of this permit is invalidated by the City of Elkhart Board of Public Works or any court of competent jurisdiction, the remaining provisions, paragraphs, words, sections and chapters shall not be affected and shall continue in full force and effect.

PART XVIII. RETENTION OF RECORDS

a) The permittee shall retain records of monitoring information, including all calibration and maintenance records and all original strip chart recordings for

b) continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least three years from the date of the sample, measurement, report or application. This period may be extended at the request of the City of Elkhart at any time.

b) All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by the City of Elkhart shall be retained and preserved by the permittee until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

This provision is mandated in accordance with the City of Elkhart Sewer Use and Rate Ordinance No. 4187, Section 3.2.8.

PART XIX. OPERATOR CERTIFICATION

The permittee shall comply with all operator certification requirements as mandated by state law.

PART XX: EXCEPTIONS

No exceptions shall be implied from any part of this permit. Any and all exceptions must be expressly stated upon approval by the City. All sections of

EXHIBIT 7

Reporting period: From January 1 to December 31, 2006

Tier Two
EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Information

Name: Elkhart Metals
Address: 1514 W Lusher Ave. - Po Box 4537
City: Elkhart State: IN Zip: 465140537
County: Elkhart
SIC Code: 5093 Dun & Bradstreet Number: 01 744 6454

FOR OFFICIAL USE ONLY — Date Received: ID:

Owner/Operator Name

Name: Sturgis Iron Metal Co Phone: 269 6517851
Mailing Address: 2160 S Centerville Road
City: Sturgis State: MI Zip: 49091

Emergency Contact

Name: Chuck Kelley Title: Operations Manager
Phone: 574 2950155 24-hr. Phone: 260 4631604
Name: Dale McDougle Title: Director of Operations
Phone: 574 3619944 24-hr. Phone: 574 3619944

Important: Read all instructions before completing form. | Reporting Period From January 1 to December 31, 2006 | ☐ Check if information below is identical to the information submitted last year.

Chemical Description	Physical and Health Hazards (check all that apply)	INVENTORY	Container Type / Pressure / Temperature	Storage Codes and Location (Non-Confidential) Storage Locations	Optional
CAS 68334305 Trade Secret ☐ Chem. name Diesel Fuel Check all that apply: ☒ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☐ Sudden Release of Pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	05 Max. Daily Amount (code) 04 Avg. Daily Amount (code) 365 No. of Days On-site (days)	B 1 4	Fuel Station	☐
CAS 8006619 Trade Secret ☐ Chem. name Gasoline Check all that apply: ☒ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☐ Sudden Release of Pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	04 Max. Daily Amount (code) 04 Avg. Daily Amount (code) 365 No. of Days On-site (days)	B 1 4 A 1 4	Fuel Station Environmental	☐
CAS 7439921 Trade Secret ☐ Chem. name Lead Check all that apply: ☒ Pure ☐ Mix ☒ Solid ☐ Liquid ☐ Gas ☐ EHS EHS Name	☐ Fire ☐ Sudden Release of Pressure ☐ Reactivity ☐ Immediate (acute) ☒ Delayed (chronic)	04 Max. Daily Amount (code) 04 Avg. Daily Amount (code) 365 No. of Days On-site (days)	R 1 4	In lead-acid	☐

Certification (read and sign after completing all sections)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages one through 5, and that based on my inquiry of those individuals responsible for obtaining the information, I believe the submitted information is true, accurate and complete.

CHUCK KELLEY, Ops Mgr — Chuck Kelley — 2-21-07

Name and official title of owner/operator's authorized representative — Signature — Date signed

OPTIONAL ATTACHEMENTS:

☒ I have attached a site plan.
☐ I have attached a list of site coordinate abbreviations.
☐ I have attached a description of dikes and other safeguard measures.

Reporting period: From January 1 to December 31, 2006 Page 2 of 5

Tier Two
EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY
Specific Information by Chemical

Facility Information
Name: Elkhart METALS
Address: 1514 W Lusher Ave. - Po Box 4537
City: Elkhart State: IN Zip: 465140537
County: Elkhart
SIC Code: 5093 Dun & Bradstreet Number: 01 744 6454
FOR OFFICIAL USE ONLY — Date Received: ID:

Owner/Operator Name
Name: Sturgis Iron Metal Co Phone: 269 6517851
Mailing Address: 2160 S Centerville Road
City: Sturgis State: MI Zip: 49091

Emergency Contact
Name: Chuck Kelley Title: Operations Manager
Phone: 574 2950155 24-hr. Phone: 269 4631604
Name: Dale McDougle Title: Director of Operations
Phone: 574 3619944 24-hr. Phone: 574 3619944

Important: Read all instructions before completing form. | Reporting Period From January 1 to December 31, 2006 | ☐ Check if information below I identical to the information submitted last year.

Chemical Description	Physical and Health Hazards (check all that apply)	INVENTORY	Storage Codes and Location (Non-Confidential)	Optional
CAS 999013 Trade Secret ☐ Chem. name: Other Chemical 11 Check all that apply: ☐ Pure ☒ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name:	☒ Fire ☐ Sudden Release of Pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	05 Max. Daily Amount (code) 04 Avg. Daily Amount (code) 365 No. of Days On-site (days)	Content Type / Pressure / Temperature A 1 4 Located at truck D 1 4 Located at truck	☐
CAS 7782447 Trade Secret ☐ Chem. name: Oxygen Check all that apply: ☒ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name:	☒ Fire ☒ Sudden Release of Pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	04 Max. Daily Amount (code) 03 Avg. Daily Amount (code) 365 No. of Days On-site (days)	L 2 4 Process building and	☐
CAS 7664939 Trade Secret ☐ Chem. name: Sulfuric acid Check all that apply: ☒ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☒ EHS EHS Name: Sulfuric acid	☐ Fire ☐ Sudden Release of Pressure ☒ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	03 Max. Daily Amount (code) 03 Avg. Daily Amount (code) 365 No. of Days On-site (days)	R 1 4 In lead-acid	☐

Certification (read and sign after completing all sections)
I certify under penalty of law that I gave personally examined and am familiar with the information submitted in pages one through 5, and that based on my inquiry of these individuals responsible for obtaining the information, I believe the submitted information is true, accurate and complete.

Chuck Kelley Ops. Mgr. — Name and official title of owner/operator's or authorized representative
Chuck Kelley — Signature
2-21-07 — Date signed

OPTIONAL ATTACHEMENTS:
☒ I have attached a site plan.
☐ I have attached a list of site coordinate abbreviations.
☐ I have attached a description of these and other safeguard measures.

Storage Locations for Reporting Period: January 1, through December 31, 2006

Chemical Description:

CAS#: 68334305

Name: Diesel Fuel

Storage Locations:

1) Fuel Station
2)
3)
4)

Chemical Description:

CAS#: 8006619

Name: Gasoline

Storage Locations:

1) Fuel Station
2) Environmental Station
3)
4)

Storage Locations for Reporting Period: January 1, through December 31, 2006

Chemical Description:

CAS#: 7439921

Name: Lead

Storage Locations:

1) In lead-acid batteries in the NW corner of Process building, in new parts storage, and in non-ferrous production area

2)

3)

4)

Chemical Description:

CAS#: 999013

Name: Other Chemical 13

Storage Locations:

1) Located at truck maintenance, process building, shear, baler, environmental station, shredder, main substation

2) Located at truck maintenance, process building, shredder. The chemical contained in these containers is OIL

3)

4)

Storage Locations for Reporting Period: January 1, through December 31, 2006

Chemical Description:

CAS#: 7782447

Name: Oxygen

Storage Locations:

1) Process building and cast iron breakage area
2)
3)
4)

Chemical Description:

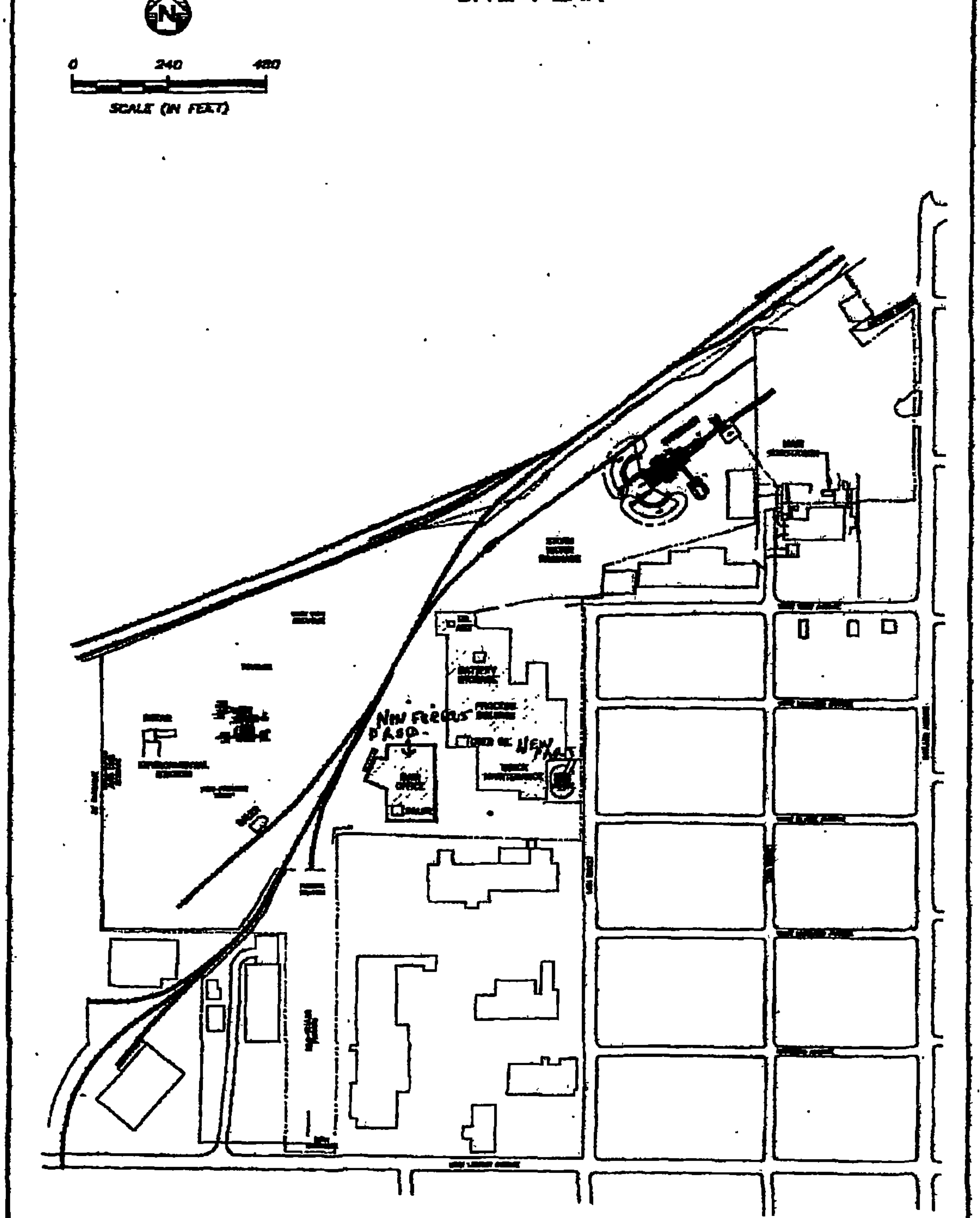
CAS#: 7664939

Name: Sulfuric acid

Storage Locations:

1) In lead-acid batteries in the NW corner of Process building, in new parts storage, and in non-ferrous production area
2)
3)
4)

SITE PLAN



CADD Review DRAWN BY: DRB Date Drawn/Rev'd 10/27/05–12/19/05	ERM	STURGIS IRON & METAL 1514 LUSHER AVENUE ELKHART, INDIANA Environmental Resources Management	CHK'D BY: FIGURE 1

2005 Tier II Report

NONCONFIDENTIAL LOCATION INFORMATION

State Form 52015 (5-95)
Indiana Department of Environmental Management
Indiana Emergency Response Commission

Read instructions found after this form before completing this form.

Important: Read all instructions before completing form. | Reporting Period: From January 1 to December 31, 2006 | ☐ Check if information below is identical to the information submitted last year

Tier II EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Identification

Facility ID # 170:2 (*From Mailing Label*)
Name Elkhart Metals
Street Address 1514 Lusher Ave. City Elkhart
County Elkhart ZIP 46514 E-mail elkchuck@sturgisiron.net
SIC Code: 5015 Dun & Bradstreet: 017446454
OFFICIAL USE ONLY (*DO NOT FILL*)
Date Received

Owner/Operator Name (*Mailing Address*)

Name Sturgis Iron & Metal Phone (269) 651-7851
Mailing Address 2110 S. Centerville Rd Sturgis, MI 49091

Emergency Contact

Name Chuck Kelley Title Operations Mgr.
Phone (574) 295-0155 24-Hr. Phone (269) 463-1609
Name Dale McDougle Title Dir. of Operations
Phone (574) 361-9944 24-Hr. Phone (574) 361-9944

Chemical Description	Physical and Health Hazards	Inventory	Container Type	Pressure	Temperature	Storage Codes and Locations (*Nonconfidential*) Storage Location	Optional
CAS 7664-93-9 ☐ Trade Secret Chem. Name Sulfuric Acid Check all that Apply: ☐ Pure ☐ Mix ☒ Solid ☐ Liquid ☒ Gas ☐ EHS EHS Name Sulfuric Acid	☐ Fire ☐ Sudden Release of pressure ☒ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	03 Max. Daily Amount (Code) 03 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	R	1	4	IN LEAD-ACID BATTERIES, LOCATED IN THE NORTHWEST CORNER OF PROCESS BUILDING, IN NEW PARTS STORAGE, AND IN THE NON-FERROUS PRODUCTION AREA	☐
CAS 7439-92-1 ☐ Trade Secret Chem. Name LEAD Check all that apply: ☐ Pure ☐ Mix ☒ Solid ☐ Liquid ☐ Gas ☐ EHS EHS Name	☐ Fire ☐ Sudden Release of pressure ☐ Reactivity ☐ Immediate (acute) ☒ Delayed (chronic)	04 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	R	1	4	IN LEAD-ACID BATTERIES, LOCATED IN THE NORTHWEST CORNER OF PROCESS BUILDING, IN NEW PARTS STORAGE, AND IN THE NON-FERROUS PRODUCTION AREA	☐

Certification: *Read and sign after completing all sections*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages 1 through 3. And that, based on my inquiry of those individuals responsible for obtaining the information, I believe the submitted information is true, accurate, and complete.

CHUCK KELLEY / OPERATIONS MGR — Chuck Kelley — 1-2-07
Name and official title of owner/operator OR authorized representative — Signature — Date signed

Optional Attachments

☐ I have attached a site plan
☐ I have attached a list of site coordinate abbreviations
☐ I have attached a description of dikes and other safeguards

NONCONFIDENTIAL LOCATION INFORMATION

State Form 82015 (6-05)
Indiana Department of Environmental Management
Indiana Emergency Response Commission

Read instruction found after this form before completing this form.

Important: Read all instructions before completing form. | Reporting Period: From January 1 to December 31 2005 | ☐ Check if information below is identical to the information submitted last year

Tier II EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Identification

Facility ID # 1705 (From Mailing Label)
Name Elkhart Metals
Street Address 1514 N. Lusher Ave City Elkhart
County Elkhart ZIP 46514 E-mail elk.chuck@sturgisiron.net
SIC Code 5015 Dunn & Bradstreet 017446454
OFFICIAL USE ONLY (DO NOT FILL)
Date Received

Owner/Operator Name (Mailing Address)

Name Sturgis Iron & Metal Phone (269) 651-7851
Mailing Address 3160 S. Centreville Rd Sturgis MI 49091

Emergency Contact

Name Chuck Kelley Title Operations Mgr.
Phone (574) 295-0155 24-Hr. Phone (850) 463-1607
Name Dale Mc Dougle Title Dir. of Operations
Phone (574) 361-9944 24-Hr. Phone (574) 361-9944

Chemical Description	Physical and Health Hazards	Inventory	Container Type	Pressure	Temperature	Storage Codes and Locations (Nonconfidential) Storage Location	Optional
CAS / Chem. Name Diesel ☐ Trade Secret Check all that Apply: ☐ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☐ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	06 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	B	1	4	At fueling Station	☐
CAS / Chem. Name Oils ☐ Trade Secret Check all that apply: ☐ Pure ☒ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☐ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	05 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	A D	1 1	4 4	Located at truck maintenance, process building, shear, baler, environmental station, main substation, shredder	☐

Certification: *Read and sign after completing all sections*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages 1 through 3. And that, based on my inquiry of those individuals responsible for obtaining the information, I believe the submitted information is true, accurate, and complete.

CHUCK KELLEY / OPERATIONS MGR. — Name and official title of owner/operator OR authorized representative
Chuck Kelley — Signature
1-2-07 — Date signed

Optional Attachments

☐ I have attached a site plan
☐ I have attached a list of the site coordinate abbreviations
☐ I have attached a description of dikes and other safeguards

NONCONFIDENTIAL LOCATION INFORMATION

State Form 82018 (5-06)
Indiana Department of Environmental Management
Indiana Emergency Response Commission

Read instruction found after this form before completing this form.

Important: Read all instructions before completing form. | Reporting Period: From January 1 to December 31, 2006 | ☐ Check if information below is identical to the information submitted last year

Tier II EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Identification

Facility ID # 1703 (*From Mailing Label*)
Name ELKHART METALS
Street Address 1514 LUSHER AVE City ELKHART
County ELKHART ZIP 46514 E-mail elkchuck@sturgisiron.net
SIC Code: 5015 Dunn & Bradstreet 017446454

OFFICIAL USE ONLY (DO NOT FILL)
Date Received

Owner/Operator Name (*Mailing Address*)

Name STURGIS IRON & METAL Phone (269) 651-7851
Mailing Address 216 D S. CENTREVILLE RD, STURGIS MI 49091

Emergency Contact

Name CHUCK KELLEY Title OPERATIONS MGR
Phone 574 295-0155 24-Hr. Phone 269 463-1604
Name DALE MCDOUGLE Title DIR. OF OPERATIONS
Phone 574 361-9944 24-Hr. Phone 574 361-9944

Chemical Description	Physical and Health Hazards	Inventory	Container Type	Pressure	Temperature	Storage Codes and Locations (*Nonconfidential*) Storage Location	Optional
CAS 7782-44-7 ☐ Trade Secret Chem. Name OXYGEN Check all that Apply: ☐ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☒ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	04 Max. Daily Amount (Code) 03 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	L	2	4	PROCESS BUILDING AND CAST IRON BREAKAGE AREA	☐
CAS 8006-61-9 ☐ Trade Secret Chem. Name GASOLINE Check all that apply: ☐ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☐ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	04 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	B	1	4	LOCATED AT THE FUELING STATION	☐

Certification: *Read and sign after completing all sections*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages 1 through 3. And that, based on my inquiry of those individuals responsible for obtaining the information, I believe the submitted information is true, accurate, and complete.

CHUCK KELLEY/OPERATIONS MGR. — Name and official title of owner/operator OR authorized representative
Chuck Kelley — Signature
1-2-07 — Date signed

Optional Attachments

☐ I have attached a site plan
☐ I have attached a list of site contact abbreviations
☐ I have attached a description of drills and other safeguards

2004 Tier II Report

NONCONFIDENTIAL LOCATION INFORMATION

State Form 52016 (6-05)
Indiana Department of Environmental Management
Indiana Emergency Response Commission

Read instructions found after this form before completing this form.

Important: Read all instructions before completing form. | Reporting Period: From January 1 to December 31, 2006 | ☐ Check if information below is identical to the information submitted last year

Tier II EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific information by Chemical

Facility Identification

Facility ID # 17013 (From Mailing Label)
Name: Elkhart Metals
Street Address: 1514 Lusher Ave. City: Elkhart
County: Elkhart ZIP: 46514 E-mail: elkchuck@sturgisiron.net
SIC Code: 5015 Dun & Bradstreet: 017446454
OFFICIAL USE ONLY (DO NOT FILL)
Date Received

Owner/Operator Name (Mailing Address)

Name: Sturgis Iron & Metal Phone: (269) 651-7851
Mailing Address: 2110 S Centerville Rd Sturgis, MI 49091

Emergency Contact:

Name: Chuck Kelley Title: Operations Mgr
Phone: (574) 295-0155 24-Hr. Phone: (269) 463-1604
Name: Dale McDougle Title: Dir. of Operations
Phone: (574) 361-9944 24-Hr. Phone: (574) 361-9944

Chemical Description	Physical and Health Hazards	Inventory	Container Type	Pressure	Temperature	Storage Codes and Locations (Nonconfidential) Storage Location	Optional
CAS: 7664-93-9 ☐ Trade Secret Chem. Name: Sulfuric Acid Check all that apply: ☐ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☒ EHS EHS Name: Sulfuric Acid	☐ Fire ☐ Sudden Release of pressure ☒ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	03 Max. Daily Amount (Code) 03 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	R	1	4	IN LEAD-ACID BATTERIES, LOCATED IN THE NORTHWEST CORNER OF PROCESS BUILDING, IN NEW PARTS STORAGE, AND IN THE NON-FERROUS PRODUCTION AREA.	☐
CAS: 7439-92-1 ☐ Trade Secret Chem. Name: LEAD Check all that apply: ☐ Pure ☐ Mix ☒ Solid ☐ Liquid ☐ Gas ☐ EHS EHS Name:	☐ Fire ☐ Sudden Release of pressure ☐ Reactivity ☐ Immediate (acute) ☒ Delayed (chronic)	04 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	R	1	4	IN LEAD-ACID BATTERIES, LOCATED IN THE NORTHWEST CORNER OF PROCESS BUILDING, IN NEW PARTS STORAGE, AND IN THE NON-FERROUS PRODUCTION AREA	☐

Certification: *Read and sign after completing all sections*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages 1 through 3. And that, based on my inquiry of those individuals responsible for obtaining the information, I believe the submitted information is true, accurate, and complete.

CHUCK KELLEY / OPERATIONS MGR — Chuck Kelley — 1-2-07
Name and official title of owner/operator OR authorized representative — Signature — Date signed

Optional Attachments

☐ I have attached a site plan
☐ I have attached a list of site-specific abbreviations
☐ I have attached a description of dikes and other safeguards

NONCONFIDENTIAL LOCATION INFORMATION

State Form 82015 (5-05)
Indiana Department of Environmental Management
Indiana Emergency Response Commission

Read instruction found at the first page before completing this form.

Important: Read all instructions before completing form. | Reporting Period: From January 1 to December 31, 2014 | ☐ Check if information below is identical to the information submitted last year

Tier II EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Identification

Facility ID # 1705 (From Mailing Label)
Name Elkhart Metals
Street Address 1514 W. Lusher Ave City Elkhart
County Elkhart ZIP 46514 E-mail elk.chuck@sturgisiron.net
SIC Code 5015 Dun & Bradstreet 017441464
OFFICIAL USE ONLY (DO NOT FILL)
Date Received

Owner/Operator Name (Mailing Address)

Name Sturgis Iron & Metal Phone 269 651-7851
Mailing Address 2100 S. Centreville Rd Sturgis MI 49091

Emergency Contact

Name Chuck Kelley Title Operations Mgr.
Phone 574 295-0155 24-Hr. Phone 260 463-1609
Name Dale Mc Dougle Title Dir. of Operations
Phone 574 361-9944 24-Hr. Phone 574 361-9944

Chemical Description	Physical and Health Hazards	Inventory	Container Type	Pressure	Temperature	Storage Codes and Locations (Nonconfidential) Storage Location	Optional
CAS 1 ☐ Trade Secret Chem. Name Diesel Check all that apply: ☐ Pure ☐ Mix ☒ Solid ☐ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☐ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	05 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	B	1	4	At fueling Station	☐
CAS ☐ Trade Secret Chem. Name Oils Check all that apply: ☐ Pure ☒ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☐ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	05 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	A D	1 1	4 4	Located at truck maintenance, process building, shear, baler, environmental station, main substation, shredder	☐

Certification: *Read and sign after completing all sections*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages 1 through 3. And that, based on my inquiry of those individuals responsible for obtaining the information, I believe the submitted information is true, accurate, and complete.

CHUCK KELLEY/OPERATIONS MGR. (Name and official title of owner/operator OR authorized representative) | Chuck Kelley (Signature) | 1-2-07 (Date signed)

Optional Attachments

☐ I have attached a site plan
☐ I have attached a list of the site coordinate abbreviations
☐ I have attached a description of dikes and other safeguards

NONCONFIDENTIAL LOCATION INFORMATION

State Form 52016 (5-05)
Indiana Department of Environmental Management
Indiana Emergency Response Commission

Read instructions found after this form before completing this form.

Important: Read all instructions before completing form. | Reporting Period: From January 1 to December 31, 2004 | ☐ Check if information below is identical to the information submitted last year

Tier II EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Identification

Facility ID # 1703 (*From Mailing Label*)
Name ELKHART METALS
Street Address 1514 LUSHER AVE City ELKHART
County ELKHART ZIP 46514 E-mail elchuck@sturgisiron.net
SIC Code: 5015 Dun & Bradstreet: 01-744-6454
OFFICIAL USE ONLY (*DO NOT FILL*)
Date Received

Owner/Operator Name (*Mailing Address*)

Name STURGIS IRON & METAL Phone (269) 651-7851
Mailing Address 2160 S. CENTERVILLE RD, STURGIS MI 49091

Emergency Contact

Name CHUCK KELLEY Title OPERATIONS MGR
Phone 574 215-0165 24-Hr. Phone 269 463-1604
Name DALE MCDOUGLE Title DIR. OF OPERATIONS
Phone 574 361-9944 24-Hr. Phone 574 361-9944

Chemical Description	Physical and Health Hazards	Inventory	Container Type	Pressure	Temperature	Storage Codes and Locations (*Nonconfidential*) Storage Location	Optional
CAS 7782-44-7 ☐ Trade Secret Chem. Name OXYGEN Check all that Apply: ☐ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☒ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	04 Max. Daily Amount (Code) 03 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	L	2	4	PROCESS BUILDING AND CAST IRON BREAKAGE AREA	☐
CAS 8006-61-9 ☐ Trade Secret Chem. Name GASOLINE Check all that apply: ☐ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☐ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	04 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	B	1	4	LOCATED AT THE FUELING STATION	☐

Certification: *Read and sign after completing all sections*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages 1 through 3, And that, based on my inquiry of those individuals responsible for obtaining the information, I believe the submitted information is true, accurate, and complete.

CHUCK KELLEY / OPERATIONS MGR — Chuck Kelley — 1-2-05
Name and official title of owner/operator OR authorized representative — Signature — Date Signed

Optional Attachments

☐ I have attached a site plan
☐ I have attached a list of the site coordinate abbreviations
☐ I have attached a description of fillers and other safeguards

2003 Tier II Report

NONCONFIDENTIAL LOCATION INFORMATION

State Form 82015 (6-05)
Indiana Department of Environmental Management
Indiana Emergency Response Commission

Read instruction found after this form before completing this form.

Important: Read all instructions before completing form. | Reporting Period: From January 1 to December 31, 2006 | ☐ Check if information below is identical to the information submitted last year

Tier II EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific information by Chemical

Facility Identification

Facility ID # 17023 (From Mailing Label)
Name: Elkhart Metals
Street Address: 1514 Lusher Ave City: Elkhart
County: Elkhart ZIP: 46514 E-mail: elk.chuck@sturgisiron.net
SIC Code: 5015 Dun & Bradstreet: 017446454
OFFICIAL USE ONLY (DO NOT FILL)
Date Received

Owner/Operator Name (Mailing Address)

Name: Sturgis Iron & Metal Phone: (269) 651-7851
Mailing Address: 2110 S. Centerville Rd Sturgis, MI 49091

Emergency Contact:

Name: Chuck Kelley Title: Operations Mgr
Phone: (574) 295-0855 24-Hr. Phone: 269 463-1604
Name: Dale McDougle Title: Dir. of Operations
Phone: (574) 361-9944 24-Hr. Phone: (574) 361-9944

Chemical Description	Physical and Health Hazards	Inventory	Container Type	Pressure	Temperature	Storage Codes and Locations (Nonconfidential) Storage Location	Optional
CAS: 7664-93-9 ☐ Trade Secret Chem. Name: Sulfuric Acid Check all that apply: ☐ Pure ☐ Mix ☒ Solid ☐ Liquid ☒ Gas EHS EHS Name: Sulfuric Acid	☐ Fire ☐ Sudden Release of pressure ☒ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	03 Max. Daily Amount (Code) 03 Avg. Daily Amount (Code) 365 No. of Days On-Site (Days)	R	1	4	IN LEAD-ACID BATTERIES, LOCATED IN THE NORTHWEST CORNER OF PROCESS BUILDING, IN NEW PARTS STORAGE, AND IN THE NON-FERROUS PRODUCTION AREA.	☐
CAS: 7439-92-1 ☐ Trade Secret Chem. Name: LEAD Check all that apply: ☐ Pure ☐ Mix ☒ Solid ☐ Liquid ☐ Gas EHS EHS Name:	☐ Fire ☐ Sudden Release of pressure ☐ Reactivity ☐ Immediate (acute) ☒ Delayed (chronic)	04 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	R	1	4	IN LEAD-ACID BATTERIES, LOCATED IN THE NORTHWEST CORNER OF PROCESS BUILDING, IN NEW PARTS STORAGE, AND IN THE NON-FERROUS PRODUCTION AREA	☐

Certification: *Read and sign after completing all sections*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages 1 through 3. And that, based on my inquiry of those individuals responsible for obtaining the information, I believe the submitted information is true, accurate, and complete.

CHUCK KELLEY / OPERATIONS MGR — Chuck Kelley — 1-2-07
Name and official title of owner/operator OR authorized representative — Signature — Date signed

Optional Attachments

☐ I have attached a site plan
☐ I have attached a list of the site coordinate abbreviations
☐ I have attached a description of dikes and other safeguards

NONCONFIDENTIAL LOCATION INFORMATION

State Form 62015 (5-05)
Indiana Department of Environmental Management
Indiana Emergency Response Commission

Read instruction found after this form before completing this form.

Important: Read all instructions before completing form. | Reporting Period: From January 1 to December 31, 2001 | ☐ Check if information below is identical to the information submitted last year

Tier II EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Identification

Facility ID #: 17015 (From Mailing Label)
Name: Elkhart Metals
Street Address: 1514 N. Lusher Ave City: Elkhart
County: Elkhart ZIP: 46514 E-mail: elk.chuck@sturgisiron.net
SIC Code: 5015 Dun & Bradstreet: 017416454
OFFICIAL USE ONLY (DO NOT FILL)
Date Received:

Owner/Operator Name (Mailing Address)

Name: Sturgis Iron & Metal Phone: 269 651-7151
Mailing Address: 210 S. Centerville Rd Sturgis MI 49091

Emergency Contact:

Name: Chuck Kelley Title: Operations Mgr.
Phone: 574 295-0155 24-Hr. Phone: 269 463-1609
Name: Dale McDougle Title: Dir. of Operations
Phone: 574 361-9944 24-Hr. Phone: 574 361-9944

Chemical Description	Physical and Health Hazards	Inventory	Container Type	Pressure	Temperature	Storage Codes and Locations (Nonconfidential) Storage Location	Optional
CAS: / ☐ Trade Secret Chem. Name: Diesel Check all that apply: ☐ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name:	☒ Fire ☐ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	05 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	B	1	4	At fueling Station	☐
CAS: ☐ Trade Secret Chem. Name: Oils Check all that apply: ☐ Pure ☒ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name:	☒ Fire ☐ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	05 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	A D	1 1	4 4	Located at truck maintenance, process building, shear, baler, environmental station, main substation shredder	☐

Certification: *Read and sign after completing all sections*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages 1 through 3. And that, based on my inquiry of those individuals responsible for obtaining the information, I believe the submitted information is true, accurate, and complete.

CHUCK KELLEY/OPERATIONS MGR — Chuck Kelley — 1-2-02
Name and official title of owner/operator OR authorized representative — Signature — Date signed

Optional Attachments

☐ I have attached a site plan
☐ I have attached a list of the site coordinate abbreviations
☐ I have attached a description of dikes and other safeguards

NONCONFIDENTIAL LOCATION INFORMATION

State Form 62016 (6-05)
Indiana Department of Environmental Management
Indiana Emergency Response Commission

Read instruction found after this form before completing this form.

Important: Read all instructions before completing form.

Reporting Period: From January 1 to December 31, 2005

☐ Check if information below is identical to the information submitted last year

Tier II EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Identification

Facility ID # 1703 *(From Mailing Label)*

Name ELKHART METALS

Street Address 1514 LUSHER AVE City ELKHART

County ELKHART ZIP 46514 E-mail elichuck@sturgisiron.net

SIC Code: 5015 Dun & Bradstreet 079466459

OFFICIAL USE ONLY *(DO NOT FILL)*

Date Received

Owner/Operator Name *(Mailing Address)*

Name STURGIS IRON & METAL Phone 269 651-7851

Mailing Address 2160 S. CENTERVILLE RD, STURGIS MI 49091

Emergency Contact

Name CHUCK KELLEY Title OPERATIONS MGR

Phone 574 295-0155 24-Hr. Phone 269 463-1604

Name DALE MCDOUGLE Title DIR. OF OPERATIONS

Phone 574 361-9944 24-Hr. Phone 574 361-9944

Chemical Description	Physical and Health Hazards		Inventory	Container Type	Pressure	Temperature	Storage Codes and Locations (*Nonconfidential*) Storage Location	Optional
CAS 7782-44-7 ☐ Trade Secret Chem. Name OXYGEN Check all that Apply: ☐ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☒ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)		04 Max. Daily Amount (Code) 03 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	L	2	4	PROCESS BUILDING AND CAST IRON BREAKAGE AREA	☐
CAS 8006-61-9 ☐ Trade Secret Chem. Name GASOLINE Check all that apply: ☐ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☐ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)		04 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	B	1	4	LOCATED AT THE FUELING STATION	☐

Certification: *Read and sign after completing all sections*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages 1 through 3 And that, based on my inquiry of those individuals responsible for obtaining the information, I believe the submitted information is true, accurate, and complete.

CHUCK KELLEY/OPERATIONS MGR — Chuck Kelley — 1-2-07

Name and official title of owner/operator OR authorized representative — Signature — Date Signed

Optional Attachments

☐ I have attached a site plan

☐ I have attached a list of facility coordinate abbreviations

☐ I have attached a description of dikes and other safeguards

2002 Tier II Report

NC/NCONFIDENTIAL LOCATION INFORMATION

State Form 52015 (5-05)
Indiana Department of Environmental Management
Indiana Emergency Response Commission

Read instructions found after this form before completing this form.

Important: Read all instructions before completing form. | Reporting Period: From January 1 to December 31, 2006 | ☐ Check if information below is identical to the information submitted last year

Tier II EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific information by Chemical

Facility Identification

Facility ID # 170-5 (From Mailing Label)
Name: Elkhart Metals
Street Address: 1514 Lusher Ave. City: Elkhart
County: Elkhart ZIP: 46514 E-mail: elkchuck@sturgisiron.net
SIC Code: 5015 Dun & Bradstreet: 017446454

OFFICIAL USE ONLY (DO NOT FILL)
Date Received:

Owner/Operator Name (Mailing Address)

Name: Sturgis Iron & Metal Phone: (269) 651-7851
Mailing Address: 2610 S. Centreville Rd Sturgis, MI 49091

Emergency Contact:
Name: Chuck Kelley Title: Operations Mgr
Phone: 574 295-0055 24-Hr. Phone: 269 463-1604
Name: Dale McDougle Title: Dir. of Operations
Phone: 574 361-9944 24-Hr. Phone: 574 361-9944

Chemical Description	Physical and Health Hazards	Inventory	Container Type	Pressure	Temperature	Storage Codes and Locations (Nonconfidential) Storage Location	Optional
CAS: 7664-93-9 ☐ Trade Secret Chem. Name: Sulfuric Acid Check all that Apply: ☐ Pure ☐ Mix ☐ Solid ☐ Liquid ☒ Gas ☒ EHS EHS Name: Sulfuric Acid	☐ Fire ☐ Sudden Release of pressure ☒ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	03 Max. Daily Amount (Code) 03 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	R	1	4	IN LEAD-ACID BATTERIES, LOCATED IN THE NORTHWEST CORNER OF PROCESS BUILDING, IN NEW PARTS STORAGE, AND IN THE NON-FERROUS PRODUCTION AREA.	☐
CAS: 7439-92-1 ☐ Trade Secret Chem. Name: LEAD Check all that apply: ☐ Pure ☐ Mix ☒ Solid ☐ Liquid ☐ Gas ☐ EHS EHS Name:	☐ Fire ☐ Sudden Release of pressure ☐ Reactivity ☐ Immediate (acute) ☒ Delayed (chronic)	04 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	R	1	4	IN LEAD-ACID BATTERIES, LOCATED IN THE NORTHWEST CORNER OF PROCESS BUILDING, IN NEW PARTS STORAGE, AND IN THE NON-FERROUS PRODUCTION AREA	☐

Certification: *Read and sign after completing all sections*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages 1 through 3. And that, based on my inquiry of those individuals responsible for obtaining the information, I believe the submitted information is true, accurate, and complete.

CHUCK KELLEY / OPERATIONS MGR — Chuck Kelley — 1-2-07
Name and official title of owner/operator OR authorized representative — Signature — Date signed

Optional Attachments

- ☒ I have attached a site plan
- ☐ I have attached a list of the site coordinate abbreviations
- ☐ I have attached a description of dikes and other safeguards

NONCONFIDENTIAL LOCATION INFORMATION

State Form 52016 (5-05)
Indiana Department of Environmental Management
Indiana Emergency Response Commission

Read instruction found after this form before completing this form.

Important: Read all instructions before completing form. | Reporting Period: From January 1 to December 31, 2007 | ☐ Check if information below is identical to the information submitted last year

Tier II EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Identification

Facility ID #: 17055 (From Mailing Label)
Name: Elkhart Metals
Street Address: 1514 N. Usher Ave City: Elkhart
County: Elkhart ZIP: 46514 E-mail: elk.chuck@sturgisiron.net
SIC Code: 5015 Dun & Bradstreet: 0174616454

OFFICIAL USE ONLY (DO NOT FILL)
Date Received:

Owner/Operator Name (Mailing Address)

Name: Sturgis Iron & Metal Phone: 269 651-7351
Mailing Address: 3140 S. Centerville Rd Sturgis MI 49091

Emergency Contact

Name: Chuck Kelley Title: Operations Mgr.
Phone: 574 295-0155 24-Hr. Phone: 260 463-1607
Name: Dale Mc Dougle Title: Dir. of Operations
Phone: 574 361-9944 24-Hr. Phone: 574 361-9944

Chemical Description	Physical and Health Hazards	Inventory	Container Type	Pressure	Temperature	Storage Codes and Locations (Nonconfidential) Storage Location	Optional
CAS: / Chem. Name: Diesel ☐ Trade Secret Check all that Apply: ☐ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name:	☒ Fire ☐ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	05 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	B	1	4	At fueling Station	☐
CAS: ___ ☐ Trade Secret Chem. Name: Oils Check all that apply: ☐ Pure ☒ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name:	☒ Fire ☐ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	05 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	A D	1 1	4 4	Located at truck maintenance, process building, shear, baler, environmental station, main substation, Shredder	☐

Certification: *Read and sign after completing all sections*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages 1 through 3. And that, based on my inquiry of those individuals responsible for obtaining the information, I believe the submitted information is true, accurate, and complete.

CHUCK KELLEY/OPERATIONS MGR — Chuck Kelley — 1-2-07
Name and official title of owner/operator OR authorized representative — Signature — Date signed

Optional Attachments

☐ I have attached a site plan
☐ I have attached a list of the site coordinate abbreviations
☐ I have attached a description of dikes and other safeguards

NONCONFIDENTIAL LOCATION INFORMATION

State Form 52016 (5-03)
Indiana Department of Environmental Management
Indiana Emergency Response Commission

Read instruction found after this form before completing this form.

Important: Read all instructions before completing form. | Reporting Period: From January 1 to December 31, 2002 | ☐ Check if information below is identical to the information submitted last year

Tier II EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Identification

Facility ID # 1703 (From Mailing Label)
Name ELKHART METALS
Street Address 1514 LUSHER AVE City ELKHART
County ELKHART ZIP 46514 E-mail ellchuck@sturgisiron.net
SIC Code 5015 Dunn & Bradstreet 017446454

OFFICIAL USE ONLY (DO NOT FILL)
Date Received

Owner/Operator Name (Mailing Address)

Name STURGIS IRON & METAL Phone (269 651-7851
Mailing Address 216 D S. CENTERVILLE RD. STURGIS MI 49091

Emergency Contact

Name CHUCK KELLEY Title OPERATIONS MGR
Phone 574 295-0155 24-Hr. Phone 269 463-1604
Name DALE MCDOUGLE Title DIR. OF OPERATIONS
Phone 574 361-9944 24-Hr. Phone 574 361-9944

Chemical Description	Physical and Health Hazards	Inventory	Container Type	Pressure	Temperature	Storage Codes and Locations (Nonconfidential) Storage Location	Optional
CAS 7782-44-7 ☐ Trade Secret Chem. Name OXYGEN Check all that Apply: ☐ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☒ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	04 Max. Daily Amount (Code) 03 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	L	2	4	PROCESS BUILDING AND CAST IRON BREAKAGE AREA	☐
CAS 8006-61-9 ☐ Trade Secret Chem. Name GASOLINE Check all that apply: ☐ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☐ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	04 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	B	1	4	LOCATED AT THE FUELING STATION	☐

Certification: *Read and sign after completing all sections*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages 1 through 3 And that, based on my inquiry of those individuals responsible for obtaining the information, I believe the submitted information is true, accurate, and complete.

CHUCK KELLEY/OPERATIONS MGR. — Chuck Kelley — 1-2-02
Name and official title of owner/operator OR authorized representative — Signature — Date signed

Optional Attachments

☐ I have attached a site plan
☐ I have attached a list of site coordinate abbreviations
☐ I have attached a description of dikes and other safeguards

EXHIBIT 8

NOT A REPORT - OLQ CHEMISTRY WORKSHEET ONLY - REFER TO ATTACHED MEMO

Volatile Organic Analysis

Automotive FLUFF

Site Name: Sturgis Metals
Location: *Elkhart, IN Elkhart Co*
Date Sampled: 7-Sep-06
Date Reported. 28-Sep-06
Lab: PACE

Method SW846-8260B

UNITS **ug/kg**

Sample # Lab	Sample # IDEM	Type/ID#	Date of Analysis	Acetone	2-butanone	4-methyl-2-pentanone	dichlorodifluorimethane	ethylbenzene	fluorotrichloromethane	styrene	Isopropylbenzene	Naphthalene	Tetrachloroethene	Toluene	xylene, m + p	xylene, o
			D L >	1100	1100	1100	230	230	230	230	230	230	230	230	460	230
RISC Default Industrial Table				**370,000**	**na**	**73,000**	**na**	**13,000**	**na**	**550,000**	**na**	**170,000**	**640**	**240,000**	**170,000**	**170,000**
875887-001	LQ3791	Auto-fluff composite	9/19/2006	1900	650(J)	590(J)	150(J,N)	500	37000(N)	1400	230(J)	1500(N)	[illegible]	770	1100	1100
875887-002	LQ3792	Methanol Trip Blank	9/19/2006													

* BLANK (Type Indicated)
** FIELD DUPLICATE

Empty Box Indicates NON-DETECTABLE
NR = NOT RUN

BOLD = Exceeds RISC Default Industrial Table
[illegible] = Concentration detected equal to or greater than the method detection limit but less than the reporting limit Therefore, results estimated
[illegible] = Spiked sample recovery not within control limits Therefore, results estimated
[illegible] = Precision not within control limits Therefore, the results estimated

NOT A REPORT - OLQ CHEMISTRY WORKSHEET ONLY - REFER TO ATTACHED MEMO

Semi-Volatiles

Site Name: Sturgis Metals
Location: Elkhart, IN Elkhart Co
Date Sampled: 7-Sep-06
Date Reported: 28-Sep-06
Lab: PACE

Automotive FLUFF

Method: SW846-8270C

UNITS **ug/kg**

Sample #		Type/ID#	Date of	bis(2-ethylhexyl)phthalate	butylbenzylphthalate	di-n-octylphthalate	fluoranthene	phenanthrene	pyrene
Lab	IDEM		Analysis						
			D L >	11,000	11000	11000	11000	11000	11000
RISC Default Industrial Table				**980,000**	**310,000**	**na**	**880,000**	**170,000**	**570,000**
875887-001	LQ3791[D]	Auto-fluff composite	9/18/2006	[88000(N)]	[9000(N)]	[8000(N)]	[4800(N)]	[3900(N)]	[3500(J)]

* BLANK (Type indicated)
** FIELD DUPLICATE

Empty Box indicates NON-DETECTABLE
NR = NOT RUN

BOLD = Exceeds RISC Default Industrial Table
(J) = Concentration detected equal to or greater than the method detection limit but less than the reporting limit Therefore, results estimated.
(N) = Spiked sample recovery not within control limits Therefore, results estimated.
[D] = Surrogates diluted out of range, Surrogate recovery could not be calculated

NOT A REPORT - OLQ CHEMISTRY WORKSHEET ONLY - REFER TO ATTACHED MEMO

Toxicity Characteristic Leachate Procedure

Volatiles

Site Name: Sturgis Metals
Location: Elkhart, IN Elkhart Co.
Date Sampled: 7-Sep-06
Date Reported. 28-Sep-06
Lab: PACE

Automotive FLUFF

Method: SW846-8260B

Note All volatiles below the limit of detection
Limit of detection ranged from 0 12 - 0.25 mg/L
UNITS **mg/L**

Sample #		Type/ID#		Tetrachloroethene
Lab	IDEM	D L >		0 005
RISC Default Industrial Table				
875887-001	LQ3791	Auto-fluff composite		[illegible]0.0026J

* BLANK (Type indicated)
** FIELD DUPLICATE

Empty Box indicates NON-DETECTABLE
NR = NOT RUN

[illegible] Concentration detected equal to or greater than the method detection limit but less than the reporting limit. Therefore, results estimated

NOT A REPORT - OLQ CHEMISTRY WORKSHEET ONLY - REFER TO ATTACHED MEMO

Toxicity Characteristic Leachate Procedure

Metals

Site Name:	Sturgis Metals
Location:	Elkhart, IN Elkhart Co
Date Sampled:	7-Sep-06
Date Reported:	28-Sep-06
Lab:	PACE

Automotive FLUFF

Method SW846-6010B, SW846-7470A
UNITS. **mg/L**

Sample #		Type/ID#	Percent Solids	As	Ba	Cd	Cr	Pb	Hg	Se	Ag
Lab	IDEM	D L >		1	1	0 25	0 25	1	0 0002	1	0 25
TCLP - Type III Waste Threshold				**0.5**	**10**	**0 1**	**0 5**	**0 5**	**0 02**	**0.1**	**0.5**
875887-001	LQ3791	Auto-fluff composite	87 6		0.95B	0.084B		0.39B	0.00015B		

* BLANK (Type indicated)
** FIELD DUPLICATE

Empty Box indicates NON-DETECTABLE
NR = NOT RUN

Note Automotive Fluff is a mixed heterogeneous Automotive Fluff / Automotive Scrap Waste

B = Analyte detected between the method detection limit and the reporting limit Therefore, results estimated

NOT A REPORT - OLQ CHEMISTRY WORKSHEET ONLY - REFER TO ATTACHED MEMO

RCRA Metals

Site Name: Sturgis Metals
Location: Elkhart, IN Elkhart Co
Date Sampled: 7-Sep-06
Date Reported: 28-Sep-06
Lab. PACE

Automotive FLUFF

Method SW846-6010B, SW846-7471A
UNITS. **mg/kg**

Sample #		Type/ID#	Percent	As	Ba	Cd	Cr	Pb	Hg	Se	Ag
Lab	IDEM	D L >	Solids	11	0 57	2 9	0 57	5 7	0 23	11	1 1
RISC Default Industrial Table			**na**	**5 8**	**1,000**	**77**	**120**	**230**	**32**	**53**	**87**
IDEM 20x Rule Potential Exceedance			**na**	**100**	**2,000**	**20**	**100**	**100**	**4**	**20**	**100**
875887-001	LQ3791	Auto-fluff composite	87 6	**12**	**550**	**25**	**240**	**1200**	**4.8**		5 6

* BLANK (Type indicated)
** FIELD DUPLICATE

Empty Box indicates NON-DETECTABLE
NR = NOT RUN

BOLD = Exceeds RISC Default Industrial Table or 20x rule for the potential to exceed TCLP
Precision not within control limits Therefore, results estimated
note Total Cd, Cr and Pb are of concern since these metals exceed the 20x rule

NOT A REPORT - OLQ CHEMISTRY WORKSHEET ONLY - REFER TO ATTACHED MEMO

PCBs

Site Name: Sturgis Metals
Location: Elkhart, IN Elkhart Co
Date Sampled: 7-Sep-06
Date Reported: 28-Sep-06
Lab: PACE

Automotive FLUFF

Method: SW846-8082

UNITS. **ug/kg**

Sample #		Type/ID#	Date of	Aroclor 1242	Aroclor 1254	Total PCBs
Lab	IDEM		Analysis			
			D.L.>	2300	2300	2300
RISC Default Industrial Table				**5,300**	**5,300**	**5,300**
875887-001	LQ3791[D]	Auto-fluff composite	9/14/2006	**47,000**	**9,400**	**57,000**

* BLANK (Type indicated)
** FIELD DUPLICATE

Empty Box indicates NON-DETECTABLE
NR = NOT RUN

[D] = Surrogates diluted out of range. Surrogate recovery could not be calculated

NOT A REPORT - OLQ CHEMISTRY WORKSHEET ONLY - REFER TO ATTACHED MEMO

Toxicity Characteristic Leachate Procedure

Semi-Volatiles

Automotive FLUFF

Site Name:	Sturgis Metals
Location	Elkhart, IN Elkhart Co
Date Sampled:	7-Sep-06
Date Reported:	28-Sep-06
Lab:	PACE

Method SW846-8270C

Note All semivolatiles below the limit of detection
Limit of detection ranged from 0 12 - 0 25 mg/L
UNITS: **mg/L**

Sample #		Type/ID#	
Lab	IDEM	D L >	
RISC Default Industrial Table			
875887-001	LQ3791	Auto-fluff composite	

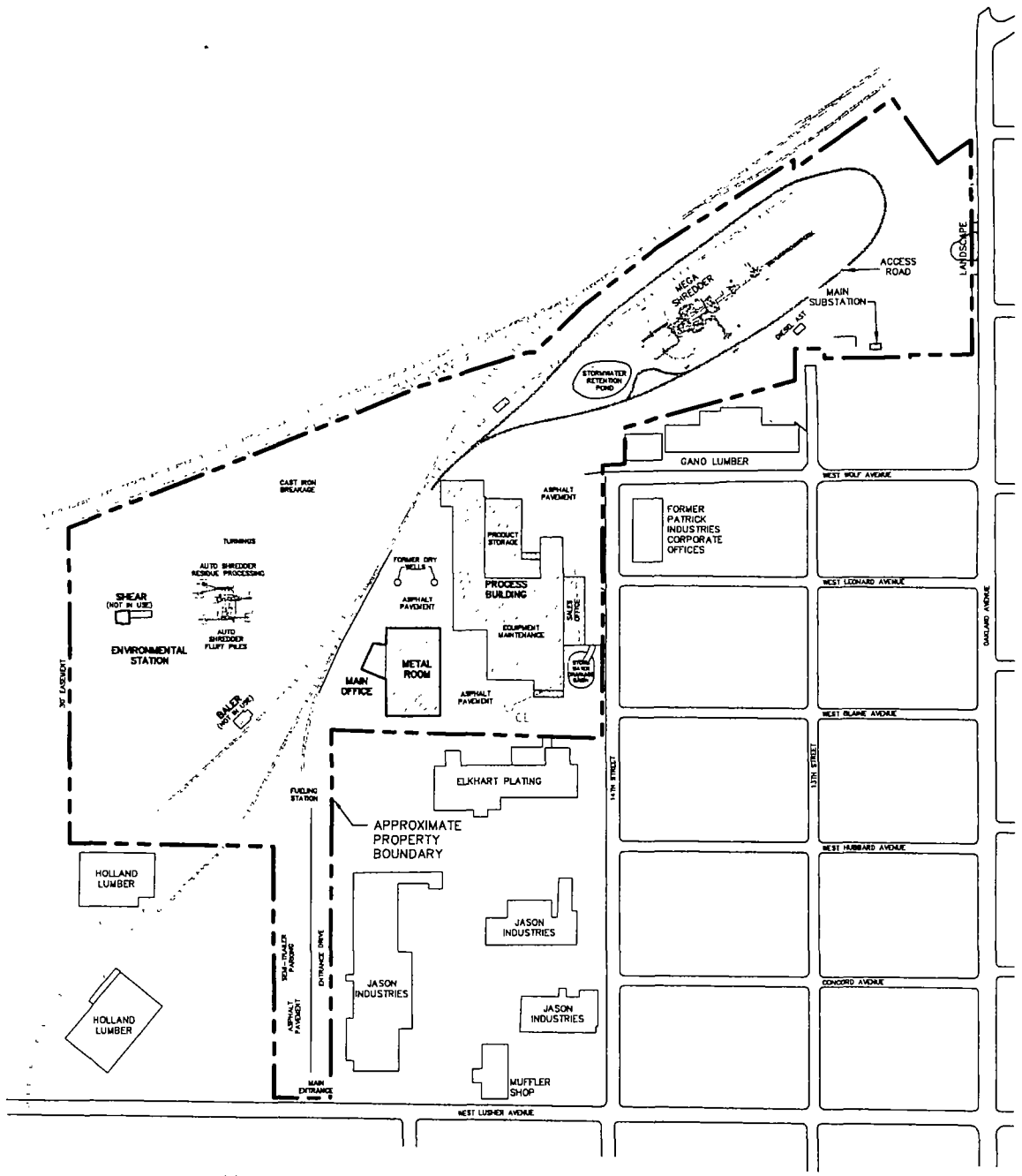
* BLANK (Type indicated)
** FIELD DUPLICATE

Empty Box indicates NON-DETECTABLE
NR = NOT RUN

EXHIBIT 9

R:\CADD\Clnt\Q-T\Sturgis Iron and Metal\0080520\Elkhart Lusher Ave\0080520-01 ELKHART LUSHER AVE.dwg, SITE PLAN 3/24/2008 3:08:28 PM FAK

SITE MAP



CADD Review FAK	ERM.	**STURGIS IRON & METAL** 1514 LUSHER AVENUE ELKHART, INDIANA	CHK'D BY CAH
DRAWN BY RMK			0080520
Date Drawn/Rev'd 2/27/08-3/24/08		Environmental Resources Management	FIGURE 2

Volatiles

Site Name. Sturgis Metals
Location· Elkhart, IN Elkhart Co
Date Sampled: 7-Sep-06
Date Reported. 5-Oct-06
Lab: PACE

SOIL

Method SW846-8260B

UNITS **ug/kg**

Sample # Lab	Sample # IDEM	Type/ID#	Date of Analysis	Fluorodichloromethane	4-Methyl-2-pentanone	Styrene	Toluene	Acetone	2-Butanone	Benzene	1 1-Dichloroethane	cis-1,2-Dichloroethene
			D L >	32	54-160	2 2-5.4	5 4-16	54-57	54	5 4	5 4	5 4
		RISC Default Induastrial Table		**na**	**73,000**	**550,000**	**240,000**	**370,000**	**na**	**350**	**58,000**	**6,800**
875884-01	LQ3806[a]	Soil Composite Shredder	9/12/06									
875883-03	LQ3808	Soil Composite Equipment Decommissioning Area	9/12/06					19 U				
875884-04	LQ3809	Soil Composite Metal Turnings Pile Footprint	9/12/06									
875884-05	LQ3810[a]	Soil Composite· Old shredder/car crusher area	9/12/06									
875887-02	LQ3792	Methanol Trip Blank	9/19/06									

* BLANK (Type indicated)
** FIELD DUPLICATE

Empty Box Indicates NON-DETECTABLE
NR = NOT RUN

BOLD = Exceeds RISC Default Industrial Table
J = Concentration detected equal to or greater than the method detection limit but less than the reporting limit Therefore, results estimated
N = Spiked sample recovery not within control limits Therefore, results estimated
[a] = Low internal standard response for LQ3806, LQ3806MS, LQ3806MSD and LQ3810 Therefore, results estimated, biased high

NOT A REPORT - OLQ CHEMISTRY WORKSHEET ONLY - REFER TO ATTACHED MEMO

RCRA Metals

Site Name: Sturgis Metals
Location. Elkhart, IN Elkhart Co
Date Sampled. 7-Sep-06
Date Reported 5-Oct-06
Lab: PACE

SOIL

Methods SW846-6020 and SW846-7471A (mercury only)

UNITS mg/Kg

Sample #		Type/ID#	Percent	As	Ba	Cd	Cr	Pb	Hg	Se	Ag
Lab	IDEM	D L >	Solids	0 32-0 39	0 32-2	0 11-0 13	0 32-0 39	0 27-0 33	0 11-0 22	0 54-0 65	0 32-0 39
		RISC Default Industrial Table	na	5 8	10,000	77	120	230	32	53	87
875884-01	LQ3806	Soil Composite Shredder	76 4	**12**	770	14	**2501**	**600**	2 1	1 6	1 4
875883-03	LQ3808	Soil Composite Equipment Decommissioning Area	86 2	**13**	210	5 9	**200**	**300**	2	0.83	3 2
875884-04	LQ3809	Soil Composite Metal Turnings Pile Footprint	92 3	**25**	33	0 83	**1700**	49	0 35	[illegible]	1 5
875884-05	LQ3810	Soil Composite Old shredder/car crusher area	92 8	**6.6**	140	0 79	24	38	0 73	[illegible]	[illegible]

* BLANK (Type indicated)
** FIELD DUPLICATE

Empty Box indicates NON-DETECTABLE
NR = NOT RUN

BOLD = Exceeds RISC Default Industrial Table

Note LQ3806 - MS/MSD for Cr, Ba, Pb and Hg Sample results greater than 4 x spike amount. LCS for analytes was acceptable Therefore, results for Cr, Ba, Pb and Hg acceptable for screen values

[illegible] = Precision not within control limits Therefore, results estimated

J = Concentration detected equal to or greater than the method detection limit but less than the reporting limit Therefore, results estimated

NOT A REPORT - OLQ CHEMISTRY WORKSHEET ONLY - REFER TO ATTACHED MEMO

PCBs

Site Name: Sturgis Metals
Location: Elkhart, IN Elkhart Co
Date Sampled 7-Sep-06
Date Reported: 5-Oct-06
Lab: PACE

SOIL

Method SW846-8082

UNITS **ug/kg**

Sample #		Type/ID#	Date of	Aroclor 1242	Aroclor 1254	Total PCBs
Lab	IDEM		Analysis			
			D L.>	43 - 780	43 - 2300	43 - 2300
RISC Default Industrial Table				**5,300**	**5,300**	**5,300**
875884-01	LQ3806	Soil Composite Shredder	9/20/06	**12,000**	2,500	**15,000**
875883-03	LQ3808[D]	Soil Composite Equipment Decommissioning Area	9/19/06		**5,600**	**5,600**
875884-04	LQ3809	Soil Composite Metal Turnings Pile Footprint	9/20/06	290	500	790
875884-05	LQ3810	Soil Composite Old shredder/car crusher area	9/19/06	210	500	710

* BLANK (Type indicated)
** FIELD DUPLICATE

Empty Box indicates NON-DETECTABLE
NR = NOT RUN

BOLD = Exceeds RISC Default Industrial Table
[D] = Surrogates diluted out of range Surrogate recovery could not be calculated

Semi-Volatile Organic Analysis

Site Name	Sturgis Metals
Location	Elkhart, IN Elkhart Co
Date Sampled	7-Sep-06
Date Reported	5-Oct-06
Lab	PACE

SOIL

Method SW846-8270C

UNITS **ug/kg**

Sample # Lab	Sample # IDEM	Type/ID#	Date of Analysis	Benzo(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Benzo(k)fluoranthene	bis(2-Ethylhexyl)phthalate	Butylbenzylphthalate	Chrysene	Di-n-octylphthalate	Fluoranthene	Phenanthrene	Pyrene	Phenol
			DL >	1300-27000	1300-27000	1300 27000	1300-27000	1300-17000	1300-27000	1300	1300	1300-27000	1300-27000	1300-17000	1400-27000
RISC Default Industrial Table				**15,000**	**11,500**	**16,000**	**39,000**	**980 000**	**310,000**	**25,000**	**2,000,000**	**680,000**	**170,000**	**970,000**	**160,000**
875884-01	LQ3806	Soil Composite Shredder	9/18/06	310(J,N)	330(J)	[illegible]	[illegible]	7900	2000	[illegible]	[illegible]	[illegible]	340(J,N)	890(J)	
875883-03	LQ3808[D,K]	Soil Composite Equipment Decommissioning Area	9/18/06			[illegible]		[illegible]						4600(J,K)	
875884-04	LQ3809	Soil Composite Metal Turnings Pile Footprint	9/18/06					1400					190(J)	180(J)	4900
875884-05	LQ3810[D,K]	Soil Composite Old shredder/car crusher area	9/18/06	5700(J,K)	5200(J,K)	15600(J,K)	4600(J,K)	57000(K)				[illegible]	5900(J,K)	13000(J,K)	

* BLANK (Type indicated)

** FIELD DUPLICATE

Empty Box indicates NON-DETECTABLE

NR = NOT RUN

BOLD = Exceeds RISC Default Industrial Table

= Precision not within control limits Therefore, results estimated

= Concentration detected equal to or greater than the method detection limit but less than the reporting limit Therefore, results estimated

= Spiked sample recovery not within control limits Therefore, results estimated

K = Analyte/surrogate detection limit may be elevated to to the presence of interfering analyte

[D] = Surrogates diluted out of range Surrogate recovery could not be calculated

NOT A REPORT - OLQ CHEMISTRY WORKSHEET ONLY - REFER TO ATTACHED MEMO

TPH

SOIL

Site Name:	Sturgis Metals
Location:	Elkhart, IN Elkhart Co
Date Sampled.	7-Sep-06
Date Reported:	5-Oct-06
Lab:	PACE

Method SW846-M8015

UNITS **mg/kg**

Sample #		Type/ID#	Date of	TPH-GRO	Date of	TPH-DRO	TPH-ERO	
Lab	IDEM		Analysis		Analysis			
			D L >	11 to 13	D L >	33 to 3700	33 to 1900	
RISC Default Industrial Table				**330**		**1000**	**na**	
875884-01	LQ3806	Soil Composite Shredder	9/12/06	5.9(J,N)	9/20/06	140(N)	300(N)	
875883-03	LQ3808	Soil Composite Equipment Decommissioning Area	9/12/06		9/20/06	**11,000**	23000	
875884-04	LQ3809	Soil Composite Metal Turnings Pile Footprint	9/12/06		9/20/06	330	550	
875884-05	LQ3810	Soil Composite Old shredder/car crusher area	9/12/06		9/20/06	**14,000**	39,000	

* BLANK (Type indicated)

** *FIELD DUPLICATE*

Empty Box indicates NON-DETECTABLE

NR = NOT RUN

BOLD = Exceeds RISC Default Industrial Table

(shaded) = Precision not within control limits Therefore, results estimated

J = Concentration detected equal to or greater than the method detection limit but less than the reporting limit Therefore, results estimated

N = Spiked sample recovery not within control limits Therefore, results estimated

e-Lab Analytical, Inc

3352 128th Avenue Holland, Michigan 49424-9263 (616) 399-6070 Fax (616) 399-6185

November 30, 2006

Sara Turrell
ERM, Inc
3352 128th Avenue
Holland, MI 49424

Tel: (616) 399-3500
Fax: (616) 399-3777

Re: Sturgis Iron & Metal Work Order : **0611442**

Dear Sara:

e-Lab Analytical, Inc received 3 samples on 11/21/06 for the analyses presented in the following report.

The analytical data provided relates directly to the samples received by e-Lab Analytical, Inc. and for only the analyses requested.

QC sample results for this data met laboratory specifications. Any exceptions are noted in the Case Narrative, or noted with qualifiers in the report or QC batch information. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained from e-Lab Analytical, Inc. The total number of pages in this report is 9.

If you have any questions regarding this report, please feel free to contact me.

Sincerely,

Tom Beamish

Electronically approved by Tom Beamish

Tom Beamish
Project Manager

Certificate No IL100452

-Lab Analytical, Inc

Date: *November 30, 2006*

CLIENT: ERM, Inc
Project: Sturgis Iron & Metal
Work Order: **0611442**

Work Order Sample Summary

Lab Samp ID	Client Sample ID	Matrix	Tag Number	Collection Date	Date Received	Hold
0611442-01	Baler Well	Water		11/21/2006 11:30	11/21/2006 03:50	☐
0611442-02	N.F. Well	Water		11/21/2006 11:40	11/21/2006 03:50	☐
0611442-03	Trip Blank	Water		11/21/2006	11/21/2006 03:50	☐

e-Lab Analytical, Inc

Date: *November 30, 2006*

CLIENT: ERM, Inc
Project: Sturgis Iron & Metal
Work Order: 0611442

Lab ID: 0611442-01A
Collection Date: 11/21/2006 11:30:00 AM
Client Sample ID: Baler Well
Matrix: WATER

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
VOLATILE ORGANIC COMPOUNDS			**EPA 8260**			Analyst **CW**
Trichloroethene	ND	1.0		µg/L	1	11/30/2006 8:31:00 AM

Lab ID: 0611442-02A
Collection Date: 11/21/2006 11:40:00 AM
Client Sample ID: N.F. Well
Matrix: WATER

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
VOLATILE ORGANIC COMPOUNDS			**EPA 8260**			Analyst **CW**
Trichloroethene	ND	1.0		µg/L	1	11/30/2006 8:03:00 AM

Lab ID: 0611442-03A
Collection Date: 11/21/2006
Client Sample ID: Trip Blank
Matrix: WATER

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
VOLATILE ORGANIC COMPOUNDS			**EPA 8260**			Analyst **CW**
Trichloroethene	ND	1.0		µg/L	1	11/26/2006 3:13:00 AM

Qualifiers:

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results RPD > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

CLIENT: ERM, Inc

ork Order: 0611442

Project: Sturgis Iron & Metal

Date: *Nov 30 2006*

QC BATCH REPORT

Batch ID **R44305** Instrument ID **VMS6** Method **EPA 8260**

MBLK Sample ID **VBLKW2-061125** Units **µg/L** Analysis Date **11/26/06 2:47**

Client ID Run ID **VMS6_061125B** SeqNo **693822** Prep Date DF **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Trichloroethene	ND	1 0								
Surr 1,2-Dichloroethane-d4	*109 1*	0 10	*100*	0	*109*	*80-120*	0			
Surr 4-Bromofluorobenzene	*98 53*	0 10	*100*	0	*98 5*	*80-120*	0			
Surr Dibromofluoromethane	*99 48*	0 10	*100*	0	*99 5*	*80-120*	0			
Surr Toluene-d8	*101 3*	0 10	*100*	0	*101*	*80-120*	0			

LCS Sample ID **VLCSW2-061125** Units. **µg/L** Analysis Date **11/26/06 1:26**

Client ID Run ID **VMS6_061125B** SeqNo **693820** Prep Date DF **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Trichloroethene	23 38	1 0	20	0	117	70-125	0			
Surr 1,2-Dichloroethane-d4	*105 5*	0 10	*100*	0	*106*	*70-120*	0			
Surr 4-Bromofluorobenzene	*105*	0 10	*100*	0	*105*	*75-120*	0			
Surr Dibromofluoromethane	*101 6*	0 10	*100*	0	*102*	*85-115*	0			
Surr Toluene-d8	*102*	0 10	*100*	0	*102*	*85-120*	0			

LCSD Sample ID **VLCSDW2-061124** Units **µg/L** Analysis Date **11/26/06 1:53**

Client ID Run ID **VMS6_061125B** SeqNo **693821** Prep Date DF **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Trichloroethene	23.89	1 0	20	0	119	70-125	23 38	2 16	30	
Surr 1,2-Dichloroethane-d4	*104 9*	0 10	*100*	0	*105*	*70-120*	105 5	*0 532*	*30*	
Surr 4-Bromofluorobenzene	*105*	0 10	*100*	0	*105*	*75-120*	105	*0 00952*	*30*	
Surr Dibromofluoromethane	*101 4*	0 10	*100*	0	*101*	*85-115*	101 6	*0 197*	*30*	
Surr Toluene-d8	*101 2*	0 10	*100*	0	*101*	*85-120*	102	*0 768*	*30*	

MS Sample ID **0611475-02C MS** Units. **µg/L** Analysis Date **11/26/06 9:54**

Client ID Run ID. **VMS6_061125B** SeqNo **693839** Prep Date. DF **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Trichloroethene	22 9	1 0	20	0	114	70-130	0			
Surr 1,2-Dichloroethane-d4	*106 4*	0 10	*100*	0	*106*	*70-130*	0			
Surr 4-Bromofluorobenzene	*104 5*	0 10	*100*	0	*104*	*70-130*	0			
Surr Dibromofluoromethane	*103*	0 10	*100*	0	*103*	*70-130*	0			
Surr Toluene-d8	*102 4*	0.10	*100*	0	*102*	*70-130*	0			

- Not Detected at the Reporting Limit
- Analyte detected below quantitation limits
- O - Referenced analyte value is > 4 times amount spiked
- S - Spike Recovery outside accepted recovery limits
- R - RPD outside accepted recovery limits
- P - Dual Column results percent difference > 40%
- B - Analyte detected in assoc Method Blank
- U - Analyzed for but not detected
- E - Value above quantitation range

CLIENT: ERM, Inc
Work Order: 0611442
ject: Sturgis Iron & Metal

QC BATCH REPORT

Batch ID **R44305** Instrument ID **VMS6** Method **EPA 8260**

MSD Sample ID **0611475-02C MSD** Units **µg/L** Analysis Date **11/26/06 10:20**

Client ID Run ID **VMS6_061125B** SeqNo **693840** Prep Date DF **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Trichloroethene	22 11	1 0	20	0	111	70-130	22 9	3 51	30	
Surr 1,2-Dichloroethane-d4	*105 3*	0 10	*100*	0	*105*	*70-130*	106 4	*1 02*	*30*	
Surr 4-Bromofluorobenzene	*103 8*	0 10	*100*	0	*104*	*70-130*	104 5	*0 701*	*30*	
Surr Dibromofluoromethane	*103 6*	0 10	*100*	0	*104*	*70-130*	103	*0 61*	*30*	
Surr Toluene-d8	*101 7*	0 10	*100*	0	*102*	*70-130*	102 4	*0 676*	*30*	

The following samples were analyzed in this batch: 0611442-03A

`ND - Not Detected at the Reporting Limit
analyte detected below quantitation limits
O - Referenced analyte value is > 4 times amount spiked

S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
P - Dual Column results percent difference > 40%

B - Analyte detected in assoc Method Blank
U - Analyzed for but not detected
E - Value above quantitation range

CLIENT: ERM, Inc
Work Order: 0611442
ject: Sturgis Iron & Metal

QC BATCH REPORT

Batch ID **R44416** Instrument ID **VMS6** Method **EPA 8260**

MBLK Sample ID **VBLKW2-061129** Units **µg/L** Analysis Date **11/30/06 12:57**
Client ID Run ID **VMS6_061129B** SeqNo **695659** Prep Date DF **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Trichloroethene	ND	1 0								
Surr 1,2-Dichloroethane-d4	*94 45*	0 10	*100*	0	*94 4*	*80-120*	0			
Surr 4-Bromofluorobenzene	*94 42*	0 10	*100*	0	*94 4*	*80-120*	0			
Surr Dibromofluoromethane	*97 76*	0 10	*100*	0	*97 8*	*80-120*	0			
Surr Toluene-d8	*98 03*	0 10	*100*	0	*98*	*80-120*	0			

LCS Sample ID **VLCSW2-061129** Units **µg/L** Analysis Date **11/29/06 23:37**
Client ID. Run ID **VMS6_061129B** SeqNo **695654** Prep Date DF **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Trichloroethene	20 04	1 0	20	0	100	70-125	0			
Surr 1,2-Dichloroethane-d4	*92 43*	0 10	*100*	0	*92 4*	*70-120*	0			
Surr 4-Bromofluorobenzene	*98 53*	0 10	*100*	0	*98 5*	*75-120*	0			
Surr Dibromofluoromethane	*100 4*	0 10	*100*	0	*100*	*85-115*	0			
Surr Toluene-d8	*97 94*	0 10	*100*	0	*97 9*	*85-120*	0			

`D Sample ID **VLCSDW2-061129** Units **µg/L** Analysis Date **11/30/06 12:03**
Client ID Run ID **VMS6_061129B** SeqNo **695658** Prep Date DF **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Trichloroethene	21 19	1 0	20	0	106	70-125	20 04	5 58	30	
Surr 1,2-Dichloroethane-d4	*92 97*	0 10	*100*	0	*93*	*70-120*	92 43	*0 583*	*30*	
Surr 4-Bromofluorobenzene	*99 25*	0 10	*100*	0	*99 2*	*75-120*	98 53	*0 728*	*30*	
Surr Dibromofluoromethane	*100 3*	0 10	*100*	0	*100*	*85-115*	100 4	*0 0897*	*30*	
Surr Toluene-d8	*97 8*	0 10	*100*	0	*97 8*	*85-120*	97 94	*0 143*	*30*	

MS Sample ID **0611284-11C MS** Units **µg/L** Analysis Date **11/30/06 8:58**
Client ID Run ID **VMS6_061129B** SeqNo **695684** Prep Date DF **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Trichloroethene	22 7	1 0	20	0	114	70-130	0			
Surr 1,2-Dichloroethane-d4	*94 9*	0 10	*100*	0	*94 9*	*70-130*	0			
Surr 4-Bromofluorobenzene	*98 4*	0 10	*100*	0	*98 4*	*70-130*	0			
Surr Dibromofluoromethane	*104*	0 10	*100*	0	*104*	*70-130*	0			
Surr Toluene-d8	*98 97*	0 10	*100*	0	*99*	*70-130*	0			

` - Not Detected at the Reporting Limit
. Analyte detected below quantitation limits
O - Referenced analyte value is > 4 times amount spiked
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
P - Dual Column results percent difference > 40%
B - Analyte detected in assoc Method Blank
U - Analyzed for but not detected
E - Value above quantitation range

CLIENT: ERM, Inc
Work Order: 0611442
Project: Sturgis Iron & Metal

QC BATCH REPORT

Batch ID: **R44416** Instrument ID **VMS6** Method **EPA 8260**

MSD Sample ID **0611284-11C MSD** Units **µg/L** Analysis Date **11/30/06 9:24**

Client ID Run ID **VMS6_061129B** SeqNo **695685** Prep Date: DF **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Trichloroethene	21 65	1 0	20	0	108	70-130	22 7	4 74	30	
Surr 1,2-Dichloroethane-d4	*94 35*	0 10	*100*	0	*94 4*	*70-130*	94 9	*0 581*	*30*	
Surr 4-Bromofluorobenzene	*98 94*	0 10	*100*	0	*98 9*	*70-130*	98 4	*0 547*	*30*	
Surr Dibromofluoromethane	*103 6*	0 10	*100*	0	*104*	*70-130*	104	*0 318*	*30*	
Surr Toluene-d8	*99 5*	0 10	*100*	0	*99 5*	*70-130*	98 97	*0 534*	*30*	

The following samples were analyzed in this batch: 0611442-01A 0611442-02A

- Not Detected at the Reporting Limit
- Analyte detected below quantitation limits
O - Referenced analyte value is > 4 times amount spiked
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
P - Dual Column results percent difference > 40%
B - Analyte detected in assoc Method Blank
U - Analyzed for but not detected
E - Value above quantitation range

☐ e-Lab Analytical, Inc.
10450 Stancliff Rd. #210
Houston, Texas 77099
(Tel) 281.530.5656
(Fax) 281.530.5887

Chain of Custody Form

page ____ of ____

The Chain of Custody is a Legal Document. All information must be completed accurately.

☒ e-Lab Analytical, Inc.
3352 128th Avenue
Holland, Michigan 4.
(Tel) 616.399.6070
(Fax) 616.399.6185

e-Lab Project Manager: TBB | e-Lab Work Order #: 06114G2

Customer Information		Project Information		Parameter/Method Request for Analysis	
Purchase Order		Project Name	STURGIS IRON & METAL	A	TCE
Work Order		Project Number	55380	B	
Company Name		Bill To Company	ERM	C	
Send Report To		Invoice Attn	SKT	D	
Address		Address		E	
				F	
City/State/Zip		City/State/Zip		G	
Phone		Phone		H	
Fax		Fax		I	
e-Mail Address		e-Mail Address		J	

No.	Sample Description	Date	Time	Matrix	Pres.	# Bottles	A	B	C	D	E	F	G	H	I	J	Hold
1	BALER WELL	11/21/06	1130	W		3	X										
2	N.F. WELL	11/21/06	1140	W		3	X										
3	TRIP Blank						X										
4																	
5																	
6																	
7																	
8																	
9																	
10																	

Sampler(s) Please Print & Sign: Sara Turrell | Shipment Method | Required Turnaround Time: (Check Box) ☐ STD 10 Wk Days ☐ 5 Wk Days ☐ 2 Wk Days ☐ 24 Hour ☐ Other | Results Due Date:

Relinquished by: Sara Turrell	Date: 11/21/06	Time: 3:50p	Received by:	Notes:		
Relinquished by:	Date: 11/21	Time: 3:50	Received by (Laboratory):	e-Lab Analytical Cooler ID	Trip Blank Number	QC Package: (Check One Box Below) ☐ Level II Std QC ☐ Level III Std QC/Raw Data ☐ Level IV SW846/CLP ☐ Other ☐ TRRP Checklist ☐ TRRP Level IV
Logged by (Laboratory):	Date: 11/21	Time:	Checked by (Laboratory): TBB			

Preservative Key: 1-HCl 2-HNO3 3-H2SO4 4-NaOH 5-Na2S2O3 6-NaHSO4 7-Other 8-4°C 9-5035

Note: 1. Any changes must be made in writing once samples and COC Form have been submitted to e-Lab Analytical, Inc.

2. Unless otherwise agreed in a formal contract, services provided by e-Lab Analytical, Inc. are expressly limited to the terms and conditions stated on the reverse.

e-Lab Analytical, Inc

Sample Receipt Checklist

Client Name ERM-HOLL

Date/Time Received: 11/21/2006 3:50:00 AM

Work Order Number 0611442

Received by: ARB

Checklist completed by _____ Signature 11/21/06 Date

Reviewed by TBB Initials 11/21/06 Date

Matrix:

Carrier name: Client

Shipping container/cooler in good condition?	Yes ☑	No ☐	Not Present ☐
Custody seals intact on shipping container/cooler?	Yes ☐	No ☐	Not Present ☑
Custody seals intact on sample bottles?	Yes ☐	No ☐	Not Present ☑
Chain of custody present?	Yes ☑	No ☐	
Chain of custody signed when relinquished and received?	Yes ☑	No ☐	
Chain of custody agrees with sample labels?	Yes ☑	No ☐	
Samples in proper container/bottle?	Yes ☑	No ☐	
Sample containers intact?	Yes ☑	No ☐	
Sufficient sample volume for indicated test?	Yes ☑	No ☐	
All samples received within holding time?	Yes ☑	No ☐	
Container/Temp Blank temperature in compliance?	Yes ☑	No ☐	
Temperature(s)/Thermometer(s).	4 0 C		
Water - VOA vials have zero headspace?	Yes ☐	No ☑	No VOA vials submitted ☐
Water - pH acceptable upon receipt?	Yes ☑	No ☐	N/A ☐

Adjusted? NO Checked by AT

Login Notes:

Client contacted ✓ Date contacted: 11/21/06 Person contacted Sara Tunnell

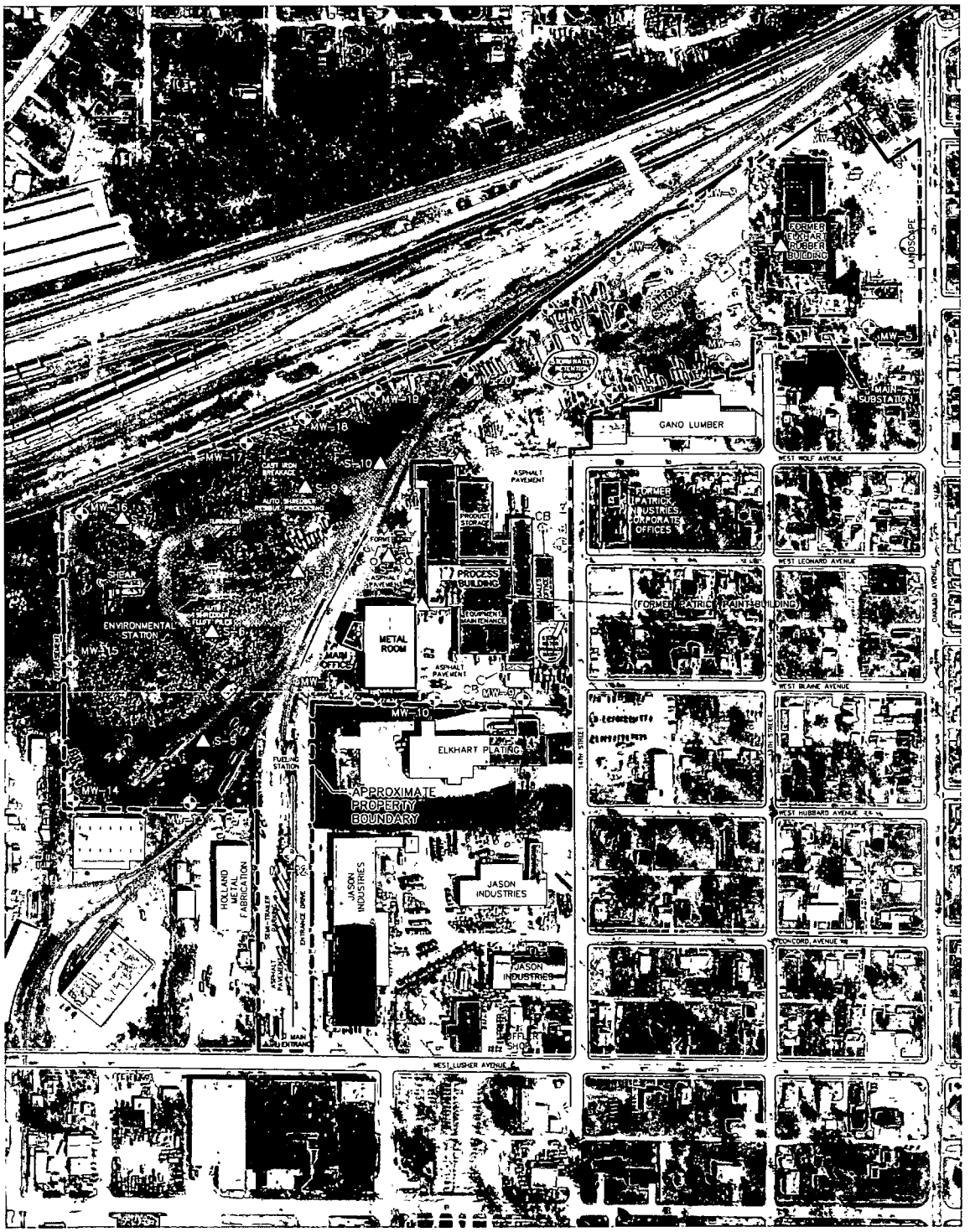
Contacted by: TBB Regarding: Headspace in samples.

Comments: Samples to be analyzed, per client request.

Corrective Action

EXHIBIT 11

APRIL 2008 SAMPLING LOCATIONS



LEGEND

- APPROXIMATE PROPERTY BOUNDARY
- SECURITY FENCE
- DOCK W/GRAVEL TRENCH
- MONITORING WELL LOCATION
- SOIL BORING LOCATION

N

0 240 480

SCALE (IN FEET)

CADD Review: FAK	ERM	**STURGIS IRON & METAL** 1514 LUSHER AVENUE ELKHART, INDIANA	CHK'D BY: MJD
DRAWN BY: GML			0080520
Date Drawn/Rev'd: 04/7/08–04/7/08		Environmental Resources Management	FIGURE 1

R:\CADD\Cin\O-T\Sturgis Iron and Metal\0080520\Elkhart Lusher Ave\0080520-01 ELKHART LUSHER AVE.dwg SAMPLING MAP 4/7/2008 4:54:02 PM RMc - HOLLAND

Table 1 of 2 *Summary of Soil Analyses- 04/03/08*
1514 Lusher Ave, Elkhart, Indiana

Analyte	RISC Default Industrial Closure Levels[A]	RISC Default Residential Closure Levels[A]	S-1 (1')	S-2 (3')	S-2 (7')	S-3 (7')	S-4 (13')	S-5 (15')	S-6 (9')	S-7 (9')	S-7 (9')	S-8 (13')	S-9 (5')	S-9 (9')	S-10 (1')	S-10 (9')
VOCs (ug/kg):																
1,1,1-Trichloroethane	280,000	1,900	ND	ND	ND	ND	ND	ND	ND	290	ND	ND	ND	ND	ND	ND
1,1,2,2-Tetrachloroethane	640	58	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,1,2-Trichloroethane	300 0000	3 00	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,1-Dichloroethane	58,000	5,600	ND	ND	ND	ND	ND	ND	ND	270	ND	ND	ND	ND	ND	ND
1,1-Dichloroethene	42,000	58	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,2-Dichloroethane	150	24	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,2-Dichloropropane	250	30	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,3-Dichloropropene, Total	200	40	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
2-Butanone (MEK)	250,000	35,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
2-Hexanone (MBK)	NA	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
4-Methyl-2-pentanone (MIBK)	75,000	20,000	840	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Acetone	370,000	28,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Benzene	350	34	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Bromodichloromethane	510	510	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Bromoform	2,700	600	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Bromomethane	700	52	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Carbon disulfide	82,000	10,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Carbon tetrachloride	290	66	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chlorobenzene	27,000	1,300	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chloroethane	10,000	650	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chloroform	1,200	470	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chloromethane	NA	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
cis-1,2-Dichloroethene	5,800	400	ND	ND	ND	ND	ND	ND	ND	600	ND	ND	ND	ND	ND	ND
cis-1,3-Dichloropropene [1]	200	40	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Dibromochloromethane	NA	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Ethylbenzene	160,000	13,000	2,600	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
m,p-Xylene	170,000	170,000	10,000	ND	ND	ND	ND	ND	ND	50	ND	ND	ND	ND	ND	ND
methylene chloride	1,800	23	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
o-Xylene	170,000	170,000	4,100	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Styrene	550,000	3,500	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Tetrachloroethene	640	58	ND	ND	ND	ND	ND	950	ND	ND	ND	ND	ND	ND	ND	ND
Toluene	240,000	12,000	120	ND	ND	ND	ND	ND	ND	78	ND	ND	ND	ND	ND	ND
trans-1,2-Dichloroethene	14,000	680	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
trans-1,3-Dichloropropene [2]	200	40	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Trichloroethene	82	57	ND	ND	ND	ND	ND	ND	ND	630	ND	ND	ND	ND	ND	ND
Vinyl chloride	27	13	ND	ND	ND	ND	ND	ND	ND	250	ND	ND	ND	ND	ND	ND
Xylenes, Total	170,000	170,000	15,000	ND	ND	ND	ND	ND	ND	50	ND	ND	ND	ND	ND	ND

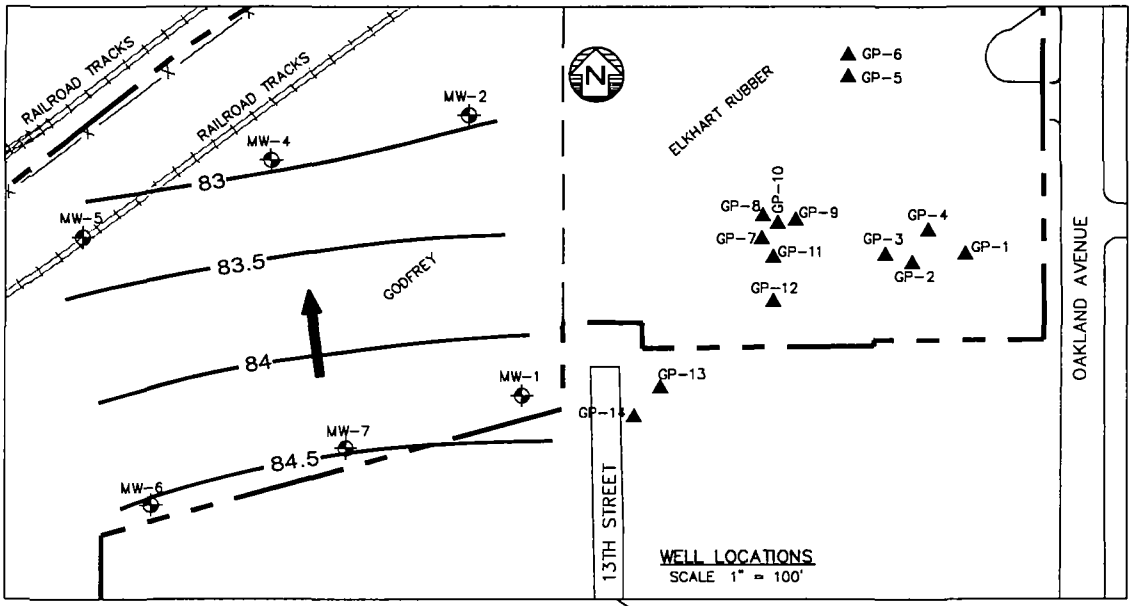
Notes
(A) - From RISC Technical Guide Table A--Default Closure Table--January 31, 2006
Shaded Values Exceed RISC Default Residential Closure Levels
Red-text values exceed RISC Default Industrial Closure Levels
1 Closure Levels are for Total 1,3-Dichloropropene, Data are for cis-1,3-Dichloropropene
2. Closure Levels are for Total 1,3-Dichloropropene, Data are for trans-1,3-Dichloropropene
NA - Criteria Not Available

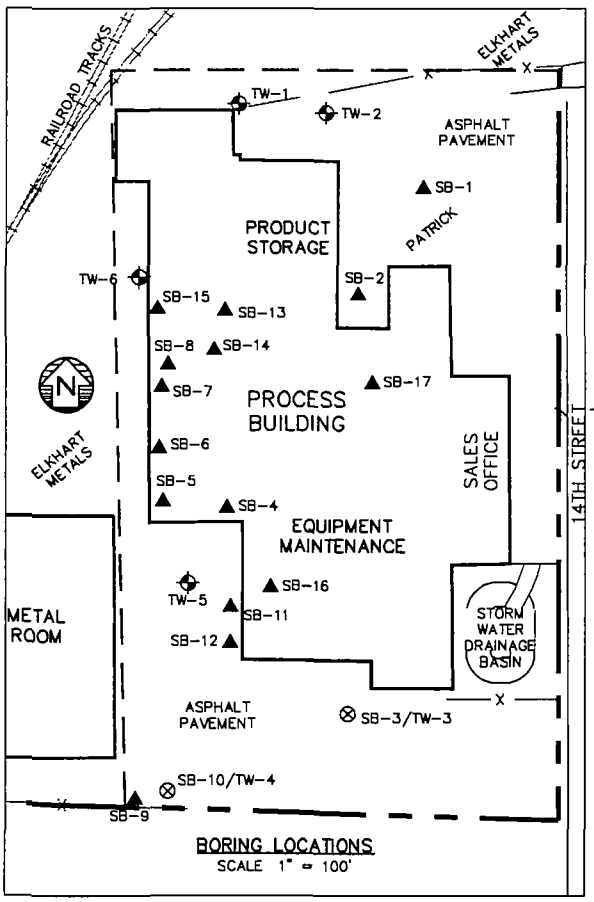
Table 2 of 2 *Summary of Groundwater Analyses 04/02/08-04/03/08*
1514 Lusher Ave, Elkhart, Indiana

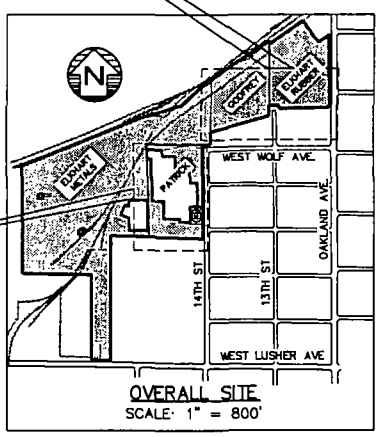
Analyte	RISC Default Industrial Closure Levels[A]	RISC Default Residential Closure Levels[A]	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-7	MW-8	MW-9	MW-10	MW-11	MW-12	MW-13	MW-14	MW-15	MW-16	MW-17	MW-18	MW-19	MW-20
VOCs (ug/L)																						
1,1,1-Trichloroethane	29,000	200	ND	ND	ND	2.1	ND	ND	ND	ND	ND	ND	ND	3 1	1.8	70	83	230	82	11	1.8	ND
1,1,2,2-Tetrachloroethane	14	0 9	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,1,2-Trichloroethane	50	5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,1-Dichloroethane	10,000	990	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	31	ND	3.1	20	270	84	ND	ND	ND
1,1-Dichloroethene	5,100	7 0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.4	ND	ND	ND	3.5	1.6	ND	ND	ND
1,2-Dichloroethane	31	5 0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.1	ND	ND	ND	ND
1,2-Dichloropropane	42	5 0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,3-Dichloropropene, Total	29	5 6	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
2-Butanone	61,000	8,400	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
2-Hexanone	NA	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
4-Methyl-2-pentanone	8,200	2,200	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Acetone	92,000	6,900	ND	ND	ND	190	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Benzene	52	5 0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	17	ND	ND	ND	ND
Bromodichloromethane	80	80 0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Bromoform	360	80 0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Bromomethane	140	11 0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Carbon disulfide	10,000	1,300	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Carbon tetrachloride	22	5 0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chlorobenzene	2,000	100	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chloroethane	990	62	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1,000	ND	ND	ND	ND
Chloroform	1,000	80	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1 0	ND	ND	ND	1.6	ND	ND	ND	ND	ND
Chloromethane	NA	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
cis-1,2-Dichloroethene	1,000	70	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	3 0	290	3.5	ND	2.6	ND
cis-1,3-Dichloropropene [1]	29	5 6	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Dibromochloromethane	NA	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Ethylbenzene	10,000	700	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	11	ND	ND	ND	ND
m,p-Xylene	20,000	10,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	13	ND	ND	ND	ND
Methylene chloride	380	5 0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
o-Xylene	20,000	10,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	3.6	ND	ND	ND	ND
Styrene	20,000	100 0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Tetrachloroethene	55	5 0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.8	ND	ND	ND	ND	ND	ND	ND
Toluene	8,200	1,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	3.9	ND	ND	ND	ND
trans-1,2-Dichloroethene	2,000	100	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	15	ND	ND	ND	ND
trans-1,3-Dichloropropene [2]	29	5 6	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Trichloroethene	7 2	5 0	170	9.5	ND	ND	ND	ND	ND	7 3	ND	22	3.0	ND	ND	14	42	16	15	80	78	5 0
Vinyl chloride	4 0	2.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	130	7.0	ND	ND	ND
Xylenes, Total	20,000	10,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	17	ND	ND	ND	ND

Notes
(A) - From RISC Technical Guide Table A--Default Closure Table--January 31, 2006
1 Closure Levels are for Total 1,3-Dichloropropene, Data are for cis-1,3-Dichloropropene
2. Closure Levels are for Total 1,3-Dichloropropene, Data are for trans-1,3-Dichloropropene
Shaded Values Exceed RISC Default Residential Closure Levels
Red text values exceed RISC Default Industrial Closure Levels
NA - Criteria Not Available
na - paramater not analyzed

SAMPLING LOCATION MAP







LEGEND

- APPROXIMATE PROPERTY BOUNDARY
- SECURITY FENCE
- MONITORING WELL LOCATION
- GEOPROBE LOCATION
- SOIL BORING LOCATION
- 84 GROUNDWATER CONTOUR
- GROUNDWATER FLOW DIRECTION

CADD Review RMK	ERM.	STURGIS IRON & METAL 1514 LUSHER AVENUE ELKHART, INDIANA	CHK'D BY CCD
DRAWN BY. PGM			0080520
Date Drawn/Rev'd 3/28/08		Environmental Resources Management	FIGURE 2

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EXHIBIT 12

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

NEW SOURCE CONSTRUCTION PERMIT AND MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

Sturgis Iron and Metal Co., Elkhart Metal Division
1514 West Lusher Avenue
Elkhart, Indiana 46517

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-20972-00622	
Issued by: Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 14, 2005 Expiration Date: June 14, 2010

COPY

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee plans to construct and operate a stationary automobile shredding and ferrous scrap separation plant.

Authorized Individual:	Director of Operations
Source Address:	1514 West Lusher Avenue, Elkhart, Indiana 46517
Mailing Address:	P.O. Box 4537, Elkhart, Indiana 47514
General Source Phone:	(574) 295-0155
SIC Code:	5093
County Location:	Elkhart
Source Location Status:	Nonattainment area for 8-hour ozone standard Attainment area for all other criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD and Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

The stationary source is approved to construct and operate the following emissions units and pollution control devices:

(a) One (1) automobile shredder, identified as 01-01 Shredder, to be constructed in 2005, consisting of an 8,000 Hp Wendt scrap shredder, with a maximum capacity of 400 tons per hour, using water sprays at the materials feed chute, cutter head, and materials output chute.

(b) Twenty-seven (27) conveyor transfer points, identified as 01-02 Conveyor, to be constructed in 2005, each with a maximum capacity of 400 tons per hour of wetted material.

(c) Two (2) ferrous/non-ferrous metal separation processes, identified as 02-01A and 02-01B, to be constructed in 2005, each consisting of magnetic separators and a z-box/cyclone air separation system, with a combined maximum capacity of 400 tons per hour, and exhausting to stacks 02-01 S1 and 02-01 S2, respectively.

(d) One (1) conveyor transfer point, identified as 02-02 Conveyor, to be constructed in 2005, with a maximum capacity of 100 tons per hour of dry material.

(e) One (1) non-ferrous metal separation process, identified as 03-01, to be constructed in 2005, consisting of a trammel, conveyor, magnetic separator and eddy current separator, with a maximum capacity of 70 tons per hour with emissions exhausting inside the building.

(f) A diesel fuel storage tank and dispensing facility, having a maximum capacity of 20,000 gallons (75.7 cubic meters) of diesel fuel.

(g) Paved and unpaved roads and parking lots with public access.

(h) Repainting of customer scrap metal bins, using less than five (5) gallons of paint per day and having a potential to emit less than 15 pounds of VOC per day.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.6 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.7 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.

(1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(2) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2-6.1-6 and an Operation Permit Validation Letter is issued.

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.

(d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

B.8 Phase Construction Time Frame

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the IDEM may revoke this permit to construct if the construction of the automobile and ferrous scrap separation plant has not begun within eighteen (18) months from the effective date of this permit or if during the construction of the automobile and ferrous scrap separation plant, work is suspended for a continuous period of one (1) year or more.

The OAQ may extend such time upon satisfactory showing that an extension, formally requested by the Permittee is justified.

B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMP's shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

(d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

B.12 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.13 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

B.14 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.15 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.5 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on March 21, 2005. The plan consists of:

Fugitive particulate matter emissions resulting from vehicle traffic on paved and unpaved roads and parking lots shall be controlled by sweeping and/or flushing with water on an as-needed basis.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements

C.7 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

no later than thirty-five (35) days prior to the intended test date.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14 days) prior to the actual date.

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements

C.9 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.10 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.11 Compliance Response Plan - Preparation and Implementation

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that re-testing in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the re-testing deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.

The response action documents submitted pursuant to this condition do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.13 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and

usual manner. [326 IAC 1-2-39]

C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) Unless otherwise specified in this permit, any annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-6-1-5(a)(1)]:

(a) One (1) automobile shredder, identified as 01-01 Shredder, to be constructed in 2005, consisting of an 8,000 Hp Wendt scrap shredder, with a maximum capacity of 400 tons per hour, using water sprays at the materials feed chute, cutter head, and materials output chute.

(b) Twenty-seven (27) conveyor transfer points, identified as 01-02 Conveyor, to be constructed in 2005, each with a maximum capacity of 400 tons per hour of wetted material.

(c) Two (2) ferrous/non-ferrous metal separation processes, identified as 02-01A and 02-01B, to be constructed in 2005, each consisting of magnetic separators and a z-box/cyclone air separation system, with a combined maximum capacity of 400 tons per hour, and exhausting to stacks 02-01 S1 and 02-01 S2, respectively.

(d) One (1) conveyor transfer point, identified as 02-02 Conveyor, to be constructed in 2005, with a maximum capacity of 100 tons per hour of dry material.

(e) One (1) non-ferrous metal separation process, identified as 03-01, to be constructed in 2005, consisting of a trammel, conveyor, magnetic separator and eddy current separator, with a maximum capacity of 70 tons per hour, with emissions exhausting inside the building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the metal shredder, ferrous/non-ferrous metal separators, non-ferrous metal separator, and conveyor transfer points shall not exceed the values shown in the following table when operating at the process weight shown:

Emission Unit	Process Weight (tons/hr)	326 IAC 6-3-2 Allowable Emissions (lbs/hr)
Metal Shredder (01-01)	400	66.3
Conveyors (01-02, 02-02)	400	66.3
Ferrous/Non-Ferrous Metal Separators (each) (02-01A, 02-01B)	200	58.5
Non-Ferrous Metal Separator (03-01)	70	47.8

The pounds per hour limitation was calculated with the following equation:
Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour;
and P = process weight rate in tons per hour

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Compliance Determination Requirements

D.1.3 Particulate Control

(a) Pursuant to 326 IAC 6-3-2, and in order to comply with Condition D.1.1, the water sprays shall be in operation and control emissions from the metal shredder at all times that the metal shredder is in operation.

(b) Pursuant to 326 IAC 6-3-2, and in order to comply with Condition D.1.1, the cyclones shall be in operation and control emissions from the z-box/cyclone metal separators at all times that the z-box/cyclone metal separators are in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)][326 IAC 2-6.1-5(a)(2)]

D.1.4 Visible Emissions Notations

(a) Visible emission notations of the ferrous/non-ferrous metal separator stack exhausts (02-01 S1 and 02-01 S2) shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those expected to prevail, eighty percent (80%) of the time the pro counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings s of the operation that would normally be expected to cause th

(d) A trained employee is an employee who has worked at the p and has been trained in the appearance and characteristics for that specific process.

(e) The Compliance Response Plan for this unit shall contain tr and response steps for when an abnormal emission is obse response steps in accordance with Section C - Compliance and Implementation shall be considered a deviation from th

We must send someone to school!

Record Keeping and Reporting Requirement

D.1.5 Record Keeping Requirements

(a) To document compliance with Condition D.1.4, the Permittee shall maintain records of visible emission notations of the ferrous/non-ferrous metal separator stack exhausts once per day.

(b) To document compliance with Condition D.1.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

(f) A diesel fuel storage tank and dispensing facility, having a maximum capacity of 20,000 gallons (75.7 cubic meters) of diesel fuel.

(g) Paved and unpaved roads and parking lots with public access.

(h) Repainting of customer scrap metal bins, using less than five (5) gallons of paint per day and having a potential to emit less than 15 pounds of VOC per day.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.2.1 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-9]

In order for 326 IAC 8-2-9 to be not applicable to the repainting operation, the amount of VOC applied shall be not exceed 15 pounds per day.

D.2.2 Particulate [326 IAC 6-3-2(d)]

In order for 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes) to be not applicable to the repainting operation, the amount of paint applied shall not exceed five (5) gallons per day.

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)] [326 IAC 2-6.1-5(a)(2)]

D.2.3 Volatile Organic Compounds (VOC) [326 IAC 12]

Pursuant to 326 IAC 12 (New Source Performance Standards), the Permittee shall maintain the following information for the 20,000 gallon (75.7 cubic meter) diesel fuel storage tank:

(a) The vessel dimensions.

(b) The vessel capacity.

The Permittee shall keep all records as described for the life of the vessel.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**Sturgis Iron and Metal Co., Elkhart Metal Division**
Address:	**1514 West Lusher Avenue**
City:	**Elkhart, Indiana 46517**
Phone #:	**(574) 295-0155**
MSOP #:	**M 039-20972-00622**

I hereby certify that Sturgis Iron and Metal Co., Elkhart Metal Division is

☐ still in operation.
☐ no longer in operation.

I hereby certify that Sturgis Iron and Metal Co., Elkhart Metal Division is

☐ in compliance with the requirements of MSOP 039-20972-00622.
☐ not in compliance with the requirements of MSOP 039-20972-00622.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERM LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_____

Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

Sturgis Iron and Metal Co., Elkhart Metal Division
1514 West Lusher Avenue
Elkhart, Indiana 46517

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)

4. I hereby certify that Sturgis Iron and Metal Co., Elkhart Metal Division, 1514 West Lusher Avenue, Elkhart, Indiana 46517, completed construction of the automobile shredding and ferrous scrap separation plant on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on March 21, 2005 and as permitted pursuant to Permit No. 039-20972-00622 issued on _____

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

_____
Signature

_____
Date

STATE OF INDIANA)
)SS
COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana on this _____ day of _____, 20 _____.

My Commission expires: _____

_____
Signature

_____
Name (typed or printed)

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
New Source Construction and Minor Source Operating Permit

Source Background and Description

Source Name:	Sturgis Iron and Metal Co., Elkhart Metal Division
Source Location:	1514 West Lusher Avenue, Elkhart, Indiana 46517
County:	Elkhart
SIC Code:	5093
Operation Permit No.:	039-20972-00622
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed an application from Sturgis Iron and Metal Co., Elkhart Metal Division relating to the construction and operation of an automobile shredding and ferrous scrap separation plant.

New Emission Units and Pollution Control Equipment

The application includes information relating to the construction and operation of the following emission units and pollution control devices:

(a) One (1) automobile shredder, identified as 01-01 Shredder, to be constructed in 2005, consisting of an 8,000 Hp Wendt scrap shredder, with a maximum capacity of 400 tons per hour, using water sprays at the materials feed chute, cutter head, and materials output chute.

(b) Twenty-seven (27) conveyor transfer points, identified as 01-02 Conveyor, to be constructed in 2005, each with a maximum capacity of 400 tons per hour of wetted material.

(c) Two (2) ferrous/non-ferrous metal separation processes, identified as 02-01A and 02-01B, to be constructed in 2005, each consisting of magnetic separators and a z-box/cyclone air separation system, with a combined maximum capacity of 400 tons per hour, and exhausting to stacks 02-01 S1 and 02-01 S2, respectively.

(d) One (1) conveyor transfer point, identified as 02-02 Conveyor, to be constructed in 2005, with a maximum capacity of 100 tons per hour of dry material.

(e) One (1) non-ferrous metal separation process, identified as 03-01, to be constructed in 2005, consisting of a trammel, conveyor, magnetic separator and eddy current separator, with a maximum capacity of 70 tons per hour with emissions exhausting inside the building.

(f) A diesel fuel storage tank and dispensing facility, having a maximum capacity of 20,000 gallons (75.7 cubic meters) of diesel fuel.

(g) Paved and unpaved roads and parking lots with public access.

(h) Repainting of customer scrap metal bins, using less than five (5) gallons of paint per day and having a potential to emit less than 15 pounds of VOC per day.

Existing Approvals

This is the first permit to be issued to this source at this location.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justifications such that the water sprays on the metal shredder (01-01 Shredder) and the cyclones on the two (2) ferrous/non-ferrous metal separation processes (02-01A and 02-01B) be considered as an integral part of the metal shredding process and the ferrous/non-ferrous metal separation processes, respectively:

(a) The materials inputs to the metal shredder consist primarily of crushed and uncrushed automobile bodies. These junk vehicle bodies typically contain flammable liquids and flammable solids. The high speed shearing action of the cutters on the Wendt metal shredder creates high instantaneous temperatures and sparks. The simultaneous presence of flammable materials and ignition sources may result in fires and explosions within the machinery. In order to prevent this, water sprays are directed at the metal shredder's material input chute, cutterhead and materials output chute, thereby thoroughly wetting the material before, during and after it is shredded. This wetting process both prevents explosions within the machinery and extinguishes any materials that ignite.

This wetting process is considered integral to the process because:

1. The water sprays serve a primary purpose other than pollution control. The purpose of the water sprays is to prevent fires and explosions within the machinery. Any fire or explosion of flammable materials within the machinery would damage it and, therefore, must be prevented. Also, any solid materials that caught fire would be transported via automatic conveyor to downline processes, with the possibility of damaging other equipment.

2. The water sprays have an overall positive net economic effect, and are designed by the manufacturer of the equipment to operate whenever the shredder operates. The constant operation of the water sprays while the shredder is in operation prevents explosions and fires which could result in damage to the shredding machine and unplanned shutdowns of the process. Damage to the machinery would result in repair and replacement costs. Process shutdowns would result in loss of revenue. Either of these results would have substantial negative financial impacts on the company.

(b) The z-box/cyclone in the ferrous/nonferrous metal separator sorts the shredded metal into ferrous, nonferrous and mixed (tramp) metals by use of an air powered centripetal process. Upon entering the metal separator, the stream of shredded metal is first sorted with magnets into ferrous and non-ferrous materials streams. The "ferrous" materials" stream (which, at this point in the process still contains about 4% non-ferrous materials by weight) then enters the z-box/cyclone where, by use of air currents, it is spun, sorted, separated and collected into ferrous and non-ferrous material streams.

The z-box/cyclone is considered integral to process because:

1. The z-box/cyclone serves a primary purpose other than pollution control. The z-box/cyclone is part of the materials sorting and collection mechanism. Its use enables high quality sorting of the input material into ferrous and non-ferrous

IDEM, OAC
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Enforcement Issue

There are n

Stack Summary

Stack ID
02-01 S1
02-01 S2

Recommendation

The staff rec
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Emission Calculati

See Append

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materials in a one-pass-through operation. (Without use of the cyclone, a poor quality sorting of materials occurs, requiring reprocessing.)

2. The process cannot operate without the z-box/cyclone. The cyclone creates the air current needed in the z-box/cyclone to sort the shredded metal that passes through the z-box/cyclone into ferrous and nonferrous materials. Without the air current, the shredded metal is not sorted.

IDEM, OAQ has evaluated the justifications and agreed that the water sprays on the metal shredder and the cyclones on the two (2) ferrous/non-ferrous metal separators will be considered as an integral part of the metal shredding and metal separation processes, respectively. Therefore, the permitting level will be determined using the potential to emit after the water sprays and cyclones.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
02-01 S1	Separator	73.5	2.5	6,000	Ambient
02-01 S2	Separator	73.5	2.5	6,000	Ambient

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on March 21, 2005.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 6).

The source reports that the composition of scrap material input to the shredding operation is 75% ferrous and 25% non-ferrous materials. Because the maximum capacity of the non-ferrous materials separator process (03-01) is 70 tons per hour (613,200 tons per year), the upstream shredder and ferrous separator processes (01-01, 01-02, 02-01A, 02-01B) can only process 2,452,800 tons per year (2,452,800 x 0.25 = 613,200) and the materials conveyor (02-02) can only process 613,200 tons per year, even though the maximum hourly operating capacities for these units are larger. PTE calculations for the entire source take this process bottleneck into account.

Potential to Emit of the Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential to Emit (tons/yr)
PM	28.1
PM-10	24.4
SO_2	0
VOC	6.2
CO	0
NO_x	0

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM is less than 100 tons per year but greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.

(b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
PM2.5	Attainment or Unclassifiable
SO_2	Attainment
NO_2	Attainment
1-hour Ozone	Maintenance Attainment
8-hour Ozone	Basic Nonattainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset (326 IAC 2-3). See the State Rule Applicability for the source section.

(b) Elkhart County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.

(c) Elkhart County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Source Status

New Source PSD Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	28.1
PM-10	24.4
SO_2	0
VOC	6.2
CO	0
NO_x	0
Single HAP	0
Combination HAPs	0

This new source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater, no nonattainment pollutant is emitted at a rate of 100 tons per year or greater, and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2 and 326 IAC 2-3, the PSD and Emission Offset requirements do not apply.

Air Quality Impacts from Minor Sources

Modeling Overview: Pursuant to 326 IAC 2-1.1-5, IDEM, OAQ, has conducted a modeling analysis of the Limited Potential to Emit (PTE) of criteria pollutants from this proposed source to estimate whether the Limited PTE of criteria pollutants will cause or contribute to a violation of any National Ambient Air Quality Standard (NAAQS).

Modeling Results – Criteria Pollutants: The modeling results indicate that the Limited PTE of criteria pollutants from this source will not exceed the National Ambient Air Quality Standards (NAAQS).

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons per year.

This is the first air approval issued to this source.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.

(b) The 20,000 gallon diesel fuel storage tank at this source is not subject to the New Source Performance Standard (NSPS), 40 CFR 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced After July 23, 1984, because the diesel fuel storage tank has a capacity greater than 75 cubic meters but less than 151 cubic meters and is used to store a liquid with a maximum true vapor pressure less than 15.0 kPa. 40 CFR 60, Subpart Kb was revised on October 15, 2003.

(c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit.

(d) The repainting of customer metal scrap bins is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Miscellaneous Metal Parts and Products Surface Coating Operations (40 CFR 63, Subpart MMMM) because this source is not a major source of HAPs (i.e., the source does not have the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs) as defined in 40 CFR 63, Subpart A. Any change that would increase HAP emissions to greater than ten (10) tons per year of a single HAP or greater than twenty-five (25) tons per year of a combination of HAPs requires prior approval from IDEM, OAQ.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not in 1 of the 28 source categories and there are no applicable New Source Performance Standards that were in effect on August 7, 1980, therefore, fugitive emissions are not counted towards applicability of PSD.

The PTE for PM, PM10, SO_2, and CO for this automobile shredding and ferrous scrap metal processing facility is less than 250 tons per year. Therefore, pursuant to 326 IAC 2-2, this source is a minor PSD source.

326 IAC 2-3 (Emission Offset)

This source is located in Elkhart County. Elkhart County was designated as a nonattainment area for the 8-hour ozone standard on June 15, 2004. The potential to emit of VOC and NOx for this source is less than 100 tons per year. Therefore, this source is a minor source under Emission Offset. Any future modifications that increase VOC or NOx emissions must be reviewed in accordance with 326 IAC 2-3.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of this automobile shredding and ferrous scrap metal processing facility will emit less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Elkhart County and the potential to emit of PM, PM10, SO_2, NOx, CO and VOC is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

The source is subject to 326 IAC 6-4 (Fugitive Dust Emissions) because the source maintains paved and unpaved roads and parking lots with public access. Pursuant to 326 IAC 6-4, the Permittee shall not generate fugitive dust to the extent that some portion of the material escapes

beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This new source is located in Elkhart County, has fugitive particulate matter emissions greater than 25 tons per year, requires a permit as set forth in 326 IAC 2, and has not received all of the necessary preconstruction approvals before December 13, 1985. Therefore, this new source is subject to the requirements of 326 IAC 6-5. Pursuant to 326 IAC 6-5, the source has submitted a fugitive particulate matter control plan with their permit application. The plan is as follows, and is appended to the permit as Appendix A:

Fugitive particulate matter emissions resulting from vehicle traffic on paved and unpaved roads and parking lots shall be controlled by sweeping and/or flushing with water on an as-needed basis.

State Rule Applicability – Individual Facilities

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2, the particulate from the metal shredder, ferrous/non-ferrous metal separators, non-ferrous metal separator, and conveyors shall be limited by the following:

Emission Unit	Process Weight (tons/hr)	326 IAC 6-3-2 Allowable Emissions (lbs/hr)
Metal Shredder (01-01)	400	66.3
Conveyors (01-02, 02-02)	400	66.3
Ferrous/Non-Ferrous Metal Separators (each) (02-01A, 02-01B)	200	58.5
Non-Ferrous Metal Separator (03-01)	70	47.8

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

The water sprays shall be in operation at all times the metal shredder is in operation, in order to comply with this limit.

The cyclones shall be in operation at all times the z-box/cyclone metal separators are in operation, in order to comply with this limit.

Calculations show that particulate emissions from the metal shredder (01-01 Shredder), the ferrous/non-ferrous metal separators (02-01A and 02-01B) and the conveyors will be in compliance with these limits. (See Appendix A)

The non-ferrous metal separator (03-01) separates non-ferrous metallic from non-metallic materials by use of a sizing screen (trammel), magnetic separator and eddy current (rapidly changing electrical field) separator, as the material travels along a conveyor. Generation of airborne particulate matter is minimal. These emissions are uncontrolled.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

The insignificant repainting of customer metal scrap bins is a manufacturing process, as defined in 326 IAC 6-3-1.5(2), and uses less than five (5) gallons of paint per day. Pursuant to 326 IAC 6-3-1(b)(15), this facility is exempt from the requirements of 326 IAC 6-3.

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

The potential VOC emissions from the insignificant repainting of customer metal scrap bins are less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

The insignificant repainting of customer metal scrap bins is located in Elkhart County, applies coatings to metal surfaces and does not have actual VOC emissions of greater than 15 pounds per day. Therefore, pursuant to 326 IAC 8-2-1(a)(4), this facility is not subject to the requirements of 326 IAC 8-2-9.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The diesel fuel storage tank is not located in Clark, Floyd, Lake, or Porter County. Therefore, the requirements of 326 IAC 8-9 do not apply to this facility.

326 IAC 12 (New Source Performance Standards)

The 20,000 gallon (75.7 cubic meter) diesel fuel storage tank is subject to the requirements of 326 IAC 12 because it has a volume greater than 75 cubic meters but less than 151 cubic meters and contains a volatile organic liquid with a maximum true vapor pressure less than 15.0 kilopascals. 326 IAC 12 incorporates by reference a version of 40 CFR 60, Subpart Kb, which predates the revisions made to 40 CFR 60, Subpart Kb on October 15, 2003. The following requirements will remain in effect until the State of Indiana incorporates the revised version of 40 CFR, Subpart Kb into its SIP.

Pursuant to 326 IAC 12, the Permittee shall maintain records of the dimensions of the tank and an analysis showing the capacity of the tank. These records shall be maintained for the life of the source.

Conclusion

The construction and operation of this automobile shredding and ferrous scrap separation plant shall be subject to the conditions of the New Source Construction and Minor Source Operating Permit M039-20972-00622.

Appendix A: Emissions Calculations
PM and PM10 Emissions from the Shredder

Company Name: Sturgis Iron and Metal Co., Elkhart Metal Division
Address: 1514 West Lusher Avenue, Elkhart, Indiana 46517
NSC/MSOP: M039-20972-00622
Reviewer: ERG/ST
Date: March 25, 2005

Process ID	Process Description	Maximum Capacity (tons/hour)	PM Emission Factor (lbs/ton)	PTE of PM (tons/year)	PM10 Emission Factor (lbs/ton)	PTE of PM10 (tons/year)
01-01	Metal Shredder	280	0.00257	3.15	0.00257	3.15

Assume all PM emissions are equal to PM10.
Material is wetted with water sprays at input feed, cutter head and output feed to minimize explosion and fire hazards.
The maximum hourly capacity for the Shredder (01-01) is limited by downstream capacity of the non-ferrous separation process.
The emission factor for the shredder is from the Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook" Appendix D, Table D-10.F, for a comparable metal shredder (1996).

METHODOLOGY
PTE of PM/PM10 (tons/year) = Maximum Capacity (tons/hour) x Emission Factor (lbs/ton) x 8760 (hrs/year) x 1 ton/2000 lbs

Appendix A: Emissions Calculations
PM and PM10 Emissions from the Conveyors

Company Name: Sturgis Iron and Metal Co., Elkhart Metal Division
Address: 1514 West Lusher Avenue, Elkhart, Indiana 46517
NSC/MSOP: M039-20972-00622
Reviewer: ERG/ST
Date: March 25, 2005

Process ID	Process Description	Number of Processes	Maximum Capacity (tons/hour)	PM Emission Factor (lbs/ton)	PTE of PM (tons/year)	PM10 Emission Factor (lbs/ton)	PTE of PM10 (tons/year)
01-02	Conveyor Transfer Point - wet	27	280	0.00014	4.64	0.000046	1.52
02-02	Conveyor Transfer Point - dry	1	70	0.003	0.92	0.0011	0.34

The material input to the conveyors is thoroughly wetted in a previous step (shredding) and remains wetted during transit on the conveyors.
The maximum capacity for conveyors (01-02) are limited by downstream capacity of the non-ferrous separation process.
The emission factor for conveyor transfer point - wet is from AP-42, Chapter 11.19, Table 11.19.2-2 (SCC 3-05-020-06) (8/04).
The emission factor for conveyor transfer point - dry is from AP-42, Chapter 11.19, Table 11.19.2-2 (SCC 3-05-020-06) (8/04).

METHODOLOGY

PTE of PM/PM10 (tons/year) = Number of Processes x Maximum Capacity (tons/hour) x Emission Factor (lbs/ton) x 8760 (hours/year) x 1 ton/2000 lbs

Appendix A: Emission Calculations
PM and PM10 Emissions from the Metal Separators

Company Name: Sturgis Iron and Metal Co., Elkhart Metal Division
Address: 1514 West Lusher Avenue, Elkhart, Indiana 46517
NSC/MSOP: M039-20972-00622
Reviewer: ERG/ST
Date: March 25, 2005

Process ID	Process Description	Number of Processes	Combined Maximum Capacity (tons/hour)	PM Emission Factor (lbs/ton)	PTE of PM (tons/year)	PM10 Emission Factor (lbs/ton)	PTE of PM10 (tons/year)
02-01A, 02-01B	Z-box Ferrous/Non-Ferrous Metal Separators	2	280	0.0137	16.8	0.0137	16.8

The maximum capacity for Z-box Ferrous/Non-Ferrous Metal Separators (02-01A, 02-01B) are limited by downstream capacity of the non-ferrous separation process.
The emission factor for the ferrous/non-ferrous metal separators are from the Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook" Appendix D, Table D-11.E, for a comparable metal separator (1996).

METHODOLOGY
PTE of PM/PM10 (tons/year) = Maximum Capacity (tons/hour) x Emission Factor (lbs/ton) x 8760 (hrs/year) x 1 ton/2000 lbs

Appendix A: Emission Calculations
VOC and PM/PM10 Emissions from Metal Coating Booth

Company Name: Sturgis Iron and Metal Co., Elkhart Metal Division
Address: 1514 West Lusher Avenue, Elkhart, Indiana 46517
NSC/MSOP: M039-20972-00622
Reviewer: ERG/ST
Date: March 25, 2005

Coating Material	Density (lbs/gal)	Weight % Water	Weight % VOC	Weight % Solids	Maximum Usage (gals/hour)	Actual VOC Usage (lbs/day)	PTE of VOC (tons/year)	PTE of PM/PM10 (tons/year)
Metal Primer	10.5	0.0%	54.2%	45.8%	0.25	14.2	6.20	2.63
Metal Topcoat	8.87	0.0%	63.2%	36.8%	0.25	14.0	6.14	1.79
					Worst Case Total	**14.2**	**6.20**	**2.63**

Surface coating booth can spray either primer or topcoat. Total assumes worst case coating
Assume all PM = PM10
Assume transfer efficiency for a spray gun is equal to 50%.
Assume all VOC is emitted.

METHODOLOGY
Actual VOC Usage (lbs/day) = Density (lbs/gal) x Weight % VOC (%) x Max. Usage (gals/hr) x 10 (hrs/day)
PTE of VOC (tons/year) = Density (lbs/gal) x Weight % VOC x Maximum Usage (gals/hour) x 8760 (hrs/year) x 1 ton/2000 lbs
PTE of PM/PM10 (tons/year) = Density (lbs/gal) x Weight % Solids x Maximum Usage (gals/hour) x 8760 (hrs/year) x 1 ton/2000 lbs x (1-Transfer Efficiency %)

Appendix A: Emission Calculations
Fugitive Emissions from Paved Roads

Company Name: Sturgis Iron and Metal Co., Elkhart Metal Division
Address: 1514 West Lusher Avenue, Elkhart, Indiana 46517
NSC/MSOP: M039-20972-00622
Reviewer: ERG/ST
Date: March 25, 2005

1. Emission Factors:

According to AP-42, Chapter 13 2.1 - Paved Roads (12/03), the PM/PM10 emission factors for paved roads can be estimated from the following equation:

$$E = k \times (sL/2)^a \times (w/3)^b - C$$

where:

E = emission factor (lb/vehicle mile traveled)
sL = road surface silt loading (g/m^2) = 0.6 (g/m^2) (AP-42, Table 13.2.1-3)
w = mean vehicle weight (tons) = 21.2 tons (see the calculations below)
k = empirical constant = 0.082 for PM and 0.016 for PM10
a = empirical constant = 0 65
b = empirical constant = 1.5
C = emission factor for vehicle exhaust (lb/VMT) = 0.00047 for PM and PM10 (AP-42, Table 13.2.1-2)

PM Emission Factor = $0.082 \times (0.6/2)^{0\ 65} \times (21.5/3)^{1\ 5} - 0\ 00047$ = **0.70 lbs/mile**

PM10 Emission Factor = $0.016 \times (0.6/2)^{0\ 65} \times (21.5/3)^{1\ 5} - 0.00047$ = **0.14 lbs/mile**

length of paved roads in one direction = **0.22 mile**

2. Potential to Emit (PTE) of PM/PM10 from Paved Roads:

Vehicle Type	* Trucks per day	*Average Vehicle Weight	* Total Trip Number	Traffic Component	Component Vehicle Weight	Vehicle Mile Traveled (VMT)	PTE of PM	PTE of PM10
		(tons)	(trips/yr)	(%)	(tons)	(miles/yr)	(tons/yr)	(tons/yr)
HH scrap receiving	25	28.0	9,125	17.9%	5.00	3,975	1.40	0.27
HH scrap shipping	25	28.0	9,125	17.9%	5.00	3,975	1.40	0.27
Semi scrap receiving	25	29.5	9,125	17 9%	5.27	3,975	1.40	0.27
Semi scrap shipping	25	29.5	9,125	17.9%	5.27	3,975	1.40	0.27
Pickup Truck	40	2.30	14,600	28.6%	0.66	6,360	2.24	0.44
Total	**140**			**100%**	**21.2**	**22,259**	**7.83**	**1.52**

* This information is provided by the source

Methodology
Component Vehicle Weight = Average Vehicle Weight (tons) x Traffic Component (%)
(Note that the summation of the component vehicle weight equals the Mean Vehicle Weight.)
VMT(miles/yr) = 0.22 mile/trip x 2 x Total Trip Numbers (trips/yr)
PTE of PM/PM10 (tons/yr) = VMT (miles/yr) x Emission Factor (lbs/mile) x 1 tons/ 2000 lbs

Appendix
Fugitive Emi

Company Name
Address
NSC/MSOF
Reviewer
Date

1. Emission Factors:

According to AP-42, C
factors for unpaved ro

$$E = k \times (s/1$$

where:

E
s
w
k
a
b

PM Emission Factor =

PM10 Emission Factor

2. Potential to Emit (PTE) of PM/

Vehicle Type	* Miles p day
10-yard Loader	45.6

* This information is provided by the source

Methodology

VMT(miles/yr) = Miles per day (mil
PTE of PM/PM10 (tons/yr) = VMT

Appendix A: Emission Calculations
Fugitive Emissions from Unpaved Roads

Company Name: Sturgis Iron and Metal Co., Elkhart Metal Division
Address: 1514 West Lusher Avenue, Elkhart, Indiana 46517
NSC/MSOP: M039-20972-00622
Reviewer: ERG/ST
Date: March 25, 2005

1. Emission Factors:

According to AP-42, Chapter 13.2.2 - Unpaved Roads (12/03), the PM/PM10 emission factors for unpaved roads can be estimated from the following equation:

$$E = k \times (s/12)^a \times (w/3)^b$$

where:

E = emission factor (lb/vehicle mile traveled)	
s = surface material silt content (%) =	2.6 % (source)
w = mean vehicle weight (tons) =	59.0 tons
k = empirical constant =	4.9 for PM and 1.5 for PM10
a = empirical constant =	0.7 for PM and 0.9 for PM10
b = empirical constant =	0.45 for PM and PM10

PM Emission Factor = $4.9 \times (2.6/12)^{0.7} \times (59/3)^{0.45}$ = **6.4 lbs/mile**

PM10 Emission Factor = $1.5 \times (2.6/12)^{0.9} \times (59/3)^{0.45}$ = **1.4 lbs/mile**

2. Potential to Emit (PTE) of PM/PM10 from Unpaved Roads:

Vehicle Type	* Miles per day	*Average Vehicle Weight	Traffic Component	Component Vehicle Weight	Vehicle Mile Traveled (VMT)	PTE of PM	PTE of PM10
		(tons)	(%)	(tons)	(miles/yr)	(tons/yr)	(tons/yr)
10-yard Loader	45.6	59	100%	59.0	11,856	38.0	8.58

* This information is provided by the source.

Methodology
VMT(miles/yr) = Miles per day (miles) x Days of Operation (days/yr)
PTE of PM/PM10 (tons/yr) = VMT (miles/yr) x Emission Factor (lbs/mile) x 1 tons/ 2000 lbs

OFFICE OF AIR QUALITY

Minor Source Criteria Pollutant Modeling
Screening Form - Raw Data

General Permit Information

Permit Number: M039-20972-00622

Company Name: Sturgis Iron and Metal Co., Elkhart Metal Division

City: Elkhart

County: Elkhart

Permit Reviewer: ERG/ST

Date results are needed:

Source Specific Information

TABLE 1 - Criteria Pollutant Emission Rates (lb/hr) - based on the highest allowable emissions rate

Stack ID	CO	NO_x	PM_{10}	Pb	SO_2
02-01 S1	0	0	1 915	0	0
02-01 S2	0	0	1 915	0	0
Totals:	*0*	*0*	*3 83*	*0*	*0*

TABLE 2 - Stack Information: (All heights are from ground level)
For non-circular stacks, take the average of the stack dimensions as the stack diameter.

Stack ID	Stack Height (ft)	Flow Rate (acfm)	Stack Temp. (°F)	Stack Diameter (ft)	Closest building related to stack: Height (ft)	Width (ft)	Length (ft)
02-01 S1	73 5	6,000	ambient	2 5			
02-01 S2	73.5	6,000	ambient	2.5			
0							
0							
0							
0							
0							

Closest Property Line (Distance in feet): 275 No No building *(Please check if this applies)*

OFFICE OF AIR QUALITY

Minor Source Criteria Pollutant Modeling
Screening Form - Modeling Results

General Permit Information

Permit Number: M039-20972-00622

Company Name: Sturgis Iron and Metal Co., Elkhart Metal Di **Model Used** ***(Please check one)*:**

City: Elkhart ☑ **SCREEN** ☐ **ISCST**

County: Elkhart **Date Modeling Completed:** 3/31/2005

Permit Reviewer: ERG/ST **Modeler:** ERG/ST

Date results are needed: NA

Modeling Results

TABLE 3 - Criteria Pollutants - Maximum Concentration (ug/m3):

Averaging Period	CO	NOX	PM10	Pb	SO2
1-hour modeled concentration					
NAAQ Standard	40000				
PASS or **FAIL**	PASS				
3-hour modeled concentration					
NAAQ Standard					1300
PASS or **FAIL**					PASS
8-hour modeled concentration					
NAAQ Standard	10000				
PASS or **FAIL**	PASS				
24-hour modeled concentration			29		
NAAQ Standard			150		365
PASS or **FAIL**			PASS		PASS
Quarterly modeled concentration					
NAAQ Standard				1.5	
PASS or **FAIL**				PASS	
Annual modeled concentration			5.8		
NAAQ Standard		100	50		80
PASS or **FAIL**		PASS	PASS		PASS

What if you are not satisfied with this decision and you want to file an appeal?

Who may file an appeal?
The decision described in the accompanying Notice of Decision may be administratively appealed. Filing an appeal is formally known as filing a "Petition for Administrative Review" to request an "administrative hearing."

If you object to this decision issued by the Indiana Department of Environmental Management (IDEM) and are: 1) the person to whom the decision was directed, 2) a party specified by law as being eligible to appeal, or 3) aggrieved or adversely affected by the decision, you are entitled to file an appeal. (An aggrieved or adversely affected person is one who would be considered by the court to be negatively impacted by the decision. If you file an appeal because you feel that you are aggrieved, it will be up to you to demonstrate in your appeal how you are directly impacted in a negative way by the decision).

The Indiana Office of Environmental Adjudication (OEA) was established by state law – see Indiana Code (IC) 4-21.5-7 – and is a separate state agency independent of IDEM. The jurisdiction of the OEA is limited to the review of environmental pollution concerns or any alleged technical or legal deficiencies associated with the IDEM decision making process. Once your request has been received by OEA, your appeal may be considered by an Environmental Law Judge.

What is required of persons filing an appeal?
Filing an appeal is a legal proceeding, so it is suggested that you consult with an attorney. Your request for an appeal must include your name and address and identify your interest in the decision (Or, if you are representing someone else, his or her name and address and their interest in the decision). In addition, please include a photocopy of the accompanying Notice of Decision or list the permit number and name of the applicant, or responsible party, in your letter.

Before a hearing is granted, you must identify the reason for the appeal request and the issues proposed for consideration at the hearing. You also must identify the permit terms and conditions that, in your judgment, would appropriately satisfy the requirements of law with respect to the IDEM decision being appealed. That is, you must suggest an alternative to the language in the permit (or other order, or decision) being appealed, and your suggested changes must be consistent with all applicable laws (See Indiana Code 13-15-6-2) and rules (See Title 315 of the Indiana Administrative Code, or 315 IAC).

The effective date of this agency action is stated on the accompanying Notice of Decision (or other IDEM decision notice). If you file a "Petition for Administrative Review" (appeal), you may wish to specifically request that the action be "stayed" (temporarily halted) because most appeals do not allow for an automatic "stay." If, after an evidentiary hearing, a "stay" is granted, the IDEM-approved action may be halted altogether, or only allowed to continue in part, until a final decision has been made regarding the appeal. However, if the action is not "stayed" the IDEM-approved activity will be allowed to continue during the appeal process.

(See reverse side)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

'itchell E. Daniels, Jr.
overnor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: June 14, 2005

RE: Sturgis Iron & Metal Co. / 039-20972-00622

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 1/10/05

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**Sturgis Iron and Metal Co., Elkhart Metal Division**
Address:	**1514 West Lusher Avenue**
City:	**Elkhart, Indiana 46517**
Phone #:	**(574) 295-0155**
MSOP #:	**M 039-20972-00622**

I hereby certify that Sturgis Iron and Metal Co., Elkhart Metal Division is
☐ still in operation.
☐ no longer in operation.

IN CONSTRUCTION

I hereby certify that Sturgis Iron and Metal Co., Elkhart Metal Division is
☑ in compliance with the requirements of MSOP 039-20972-00622.
☐ not in compliance with the requirements of MSOP 039-20972-00622.

Authorized Individual (typed):	Dale McDougle
Title:	Director of Operations
Signature:	
Date:	May 26, 2006

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

COPY

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**Sturgis Iron and Metal Co., Elkhart Metal Division**
Address:	**1514 West Lusher Avenue**
City:	**Elkhart, Indiana 46517**
Phone #:	**(574) 295-0155**
MSOP #:	**M 039-20972-00622**

I hereby certify that Sturgis Iron and Metal Co., Elkhart Metal Division is
☐ still in operation.
☐ no longer in operation. IN CONSTRUCTION

I hereby certify that Sturgis Iron and Metal Co., Elkhart Metal Division is
☑ in compliance with the requirements of MSOP 039-20972-00622.
☐ not in compliance with the requirements of MSOP 039-20972-00622.

Authorized Individual (typed):	Dale McDougle
Title:	Director of Operations
Signature:	
Date:	May 26, 2006

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

COPY

EXHIBIT 13

NOTICE OF INTENT (NOI) STORM WATER RUNOFF ASSOCIATED WITH CONSTRUCTION ACTIVITY

State Form 47487 (R6 / 9-04)
Approved by State Board of Accounts 2004
Indiana Department of Environmental Management
Drinking Water Branch

Submission of this Notice of Intent letter constitutes notice that the project site owner is applying for coverage under the National Pollutant Discharge Elimination System (NPDES) General Permit Rule for Storm Water Discharges Associated with Construction Activity. Permitted project site owners are required to comply with all terms and conditions of the General Permit Rule 327 IAC 15-5 (Rule 5).

Check the type of Submittal: [X] Initial [ ] Amendment [ ] Renewal

(Permit Number below required for Renewals and Admendments Only - Not required for Initial Submittal)

Project Name and Location:

Project Permit # _____ Project Name: HEAVY SHREDDER County: ELKHART

Brief Description of Project Location W OF OAKLAND AVE. & N OF LUSNER AVE IN CITY OF ELKHART

Latitude Deg 41 / Min. 40 / Sec 31.2 and Quarter SE Section 7

Longitude Deg 85 / Min 59 / Sec 23.9 Township 37 N Range 5E

Does [X] all or [ ] part of this project lie within the jurisdictional boundaries of a Municipal Separate Storm Sewer System (MS4) [X] Yes [ ] No If yes, please name the MS4(s):

GREATER ELKHART COUNTY

Project Site Owner and Project Contact Information:

Company Name (If Applicable): CR MEYER

Project Site Owner's Name (An Individual) DONALD "BUCK" LARSH Title/Position:

Address P O BOX 2157

City OSHKOSH State: WI Zip: 54903

Phone: 920-235-3350 E-Mail Address (If Available):

Ownership Status (check one): Governmental Agency: [ ] Federal [ ] State [ ] Local

Non-Governmental: [ ] Public [X] Private [ ] Other (Explain):

Contact Person: JASON M. HANAWAY Affiliation with Project Site Owner: PROJECT ENGINEER

Company Name: WILLIAMS & PEIRCE

Address (if different from above): 4703 CHESTER DR.

City ELKHART State IN Zip 46516

Phone: 574-293-7762 E-Mail Address (If Available) JHANAWAY@WILLIAMSPEIRCE.COM

Project Description:

[ ] Residential-Single Family [ ] Residential-Multi-Family [ ] Commercial [X] Industrial [ ] Other

Discharge Information:

Name of Receiving Water: ST. JOSEPH RIVER

(If applicable, name of municipal operator of storm sewer. Please note that even if a retention pond is present on the property, the name of the nearest possible receiving water is required).

Project Acreage:

Total Acreage: 17.61 Acres Proposed Acreage to be Disturbed: 8 Acres

Total Impervious Surface Area (Estimated for Completed Project): 116708 Square Feet

(as defined in 327 IAC 15-5-4(16) including structures, roads, parking lots, and other similar improvements)

Timetable:

Start Date: JULY 1, 2005 and Estimated End Date for all Land Disturbing Activity: JAN. 1, 2006

NOTE: Within forty-eight hours of the initiation of construction activity, the project site owner must notify the appropriate plan reviewing agency of the actual project start date.

(Continued on Reverse Side)

Construction Plan Certification:

By signing this Notice of Intent letter, I certify the following

A The storm water quality measures included in the construction plan comply with the requirements of 327 IAC 15-5-6.5, 327 IAC 15-5-7, and 327 IAC 15-5-7.5;

B the storm water pollution prevention plan complies with all applicable federal, state, and local storm water requirements.

C the measures required by 327 IAC 15-5-7 and 327 IAC 15-5-7.5 will be implemented in accordance with the storm water pollution prevention plan;

D if the projected land disturbance is one (1) acre or more the applicable Soil and Water Conservation District or other entity designated by the Department, has been sent a copy of the construction plan for review,

E storm water quality measures beyond those specified in the storm water pollution prevention plan will be implemented during the life of the permit if necessary to comply with 327 IAC 15-5-7, and

F implementation of storm water quality measures will be inspected by trained individuals.

In addition to this form, I have enclosed the Following:

☑ Verification by the reviewing agency of acceptance of the construction plan

☑ Proof of publication in a newspaper of general circulation in the affected area that notified the public that a construction activity is to commence, including all required elements contained in 327 IAC 15-5-5 (9)

☑ $100 check or money order payable to the Indiana Department of Environmental Management. If the project lies solely within the permitted jurisdiction of an MS4 **and is regulated by the MS4 under 327 IAC 15-13 – a fee is not required with submittal of this Notice of Intent**

A permit issued under 327 IAC 15-5 is granted by the commissioner for a period of five (5) years from the date coverage commences. Once the five (5) year permit term duration is reached, a general permit issued under this rule will be considered expired, and, as necessary for construction activity continuation, a new Notice of Intent letter would need to be submitted ninety (90) days prior to the termination of coverage.

Project Site Owner Responsibility Statement:

By signing this Notice of Intent letter, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Printed Name of Project Owner _____

Signature of Project Owner Barry Ritter Date: 6-23-05

This Notice of Intent must be signed by an individual meeting the signatory requirements in 327 IAC 15-4-3(g) and submitted in accordance with 327 IAC 15-5-6.

Mail this form to: Indiana Department of Environmental Management
Urban Wet Weather Section
Cashiers Office Attn: OWQ Rule 5
100 North Senate Avenue
Indianapolis, IN 46204

327 IAC 15-5-6 (a) also requires a copy of the completed Notice of Intent letter be submitted to the local Soil and Water Conservation District or other entity designated by the Department, where the land disturbing activity is to occur.

Questions regarding the development of the Construction Plan and/or field implementation of 327 IAC 15-5 may be directed to your local Soil and Water Conservation District office or the Department of Natural Resources at 317-233-3870. Questions regarding the Notice of Intent may be directed to the Rule 5 contact person at 317/233-1864 or 800/451-6027 ext 31864

Elkhart County Soil and Water Conservation District
17746 B County Road 34, Goshen IN 46528-9261 ◆ Phone: (574) 533-3630, Ext 3 ◆ Fax: (574) 533-4620

Fax Cover Sheet

Date: 6-22-05

To: Mr. Donald Coobs, C R Meyer
Fax #: 920-235-3919

From: Eric Kurtz
Elkhart County SWCD
Fax#: 574/533-4620
Phone#: 574/533-3630 x3

Pages (including cover sheet): 4

* * * * *

Attached is the stormwater pollution prevention plan review for your project. The plan is adequate as submitted. Please copy the cover page of the review and submit with the Notice of Intent (NOI) packet. The NOI packet also includes the NOI Form, Public Notice and the $100 Filing Fee. To make sure you have the most up-to-date form, I recommend that you download the NOI from the IDEM Website each time you need it. That website is
http://www.in.gov/icpr/webfile/formsdiv/47487.pdf

Construction may start 48 hours after the postmarked date of your NOI submittal to IDEM.

Make sure amendments to the plan are delivered to the contractor and are utilized in the construction of this project

Construction/Stormwater Pollution Prevention Plan Technical Review and Comment *(Form 1)*

Project Information

Project Name: Sturgis Iron & Metal Heavy Shredder Site County: Elkhart
Plan Submittal Date: 06/06/05 Hydrologic Unit Code: *04050001220010
Project Location Description: W Side of Oakland Ave. N of Lusher Ave., Elkhart
Latitude and Longitude Lat 41 40' 01.2"N Long. 85 59' 23.9"W
Civil Township: Concord Quarter: SE Section: 7 Township: 37N Range: 5E

Project Owner Name: CR Meyer
Contact: Donald Laabs
Address: P.O. Box 2157
City: Oshkosh State: WI Zip: 54903
Phone: 920-235-3350 FAX: 920-235-3419 E-Mail:

Plan Preparer Name: Jason Hanaway
Affiliation: Wightman Petrie, Inc.
Address: 4703 Chester Dr
City: Elkhart State: IN Zip: 46516
Phone: 574-293-7762 FAX: 574-294-3717 E-Mail: jhanaway@wightmanpetrie.com

Plan Review

Review Date: 06/22/05
Principal Plan Reviewer: Eric Kurtz, Urban Conservationist
Agency: Elkhart Co. Soil and Water Conservation District
Address: 17746-B CR 34
City: Goshen State: IN Zip: 46528
Phone: 574-533-3630 x3 FAX: 574-533-4620 E-Mail: Eric.Kurtz@IN.Nacdnet.net
Assisted By:

☑ **PLAN IS ADEQUATE:** A comprehensive plan review has been completed and it has been determined that the plan satisfies the minimum requirements and intent of 327 IAC 15-5.

- ☑ Please refer to additional information included on the following page(s).
- ☑ Submit Notice of Intent (NOI): *Attach a copy of this cover page when submitting the NOI to the Indiana Department of Environmental Management. Construction activities may begin 48 hours following the submittal of the NOI. A copy of the NOI must also be sent to the Reviewing Authority (e.g. SWCD, DNR).*

☐ A preliminary plan review has been completed; a comprehensive review will not be completed within the 28-day review period. The reviewing authority reserves the right to perform a comprehensive review at a later date and revisions to the plan may be required at that time to address deficiencies.

- ☐ Please refer to additional information included on the following page(s).
- ☐ Submit Notice of Intent (NOI): *Attach a copy of this cover page when submitting the NOI to the Indiana Department of Environmental Management. Construction activities may begin 48 hours following the submittal of the NOI. A copy of the NOI must also be sent to the Reviewing Authority (e.g. SWCD, DNR).*

☐ **PLAN IS DEFICIENT:** Significant deficiencies were identified during the plan review.

- ☐ Please refer to additional information included on the following page(s).
- ☐ DO NOT file a Notice of Intent for this project.
- ☐ DO NOT commence land disturbing activities until all deficiencies are adequately addressed, the plan re-submitted, and notification has been received that the minimum requirements have been satisfied.

☐ Plan Revisions ☐ Deficient Items should be mailed or delivered to the Principal Plan Reviewer identified in the Plan Review Section above.

Construction/Stormwater Pollution Prevention Plan - Technical Review and Comment *(Form 1)*

Project Name: Sturgis Iron & Metal Heavy Shredder Site
Date Reviewed: 06/22/05

The technical review and comments are intended to evaluate the completeness of the Construction/Stormwater Pollution Prevention Plan for the project. The Plan submitted was not reviewed for the adequacy of the engineering design. All measures included in the plan, as well as those recommended in the comments, should be evaluated as to their feasibility by a qualified individual with structural measures designed by a qualified engineer. The Plan has not been reviewed for other local, state, or federal permits that may be required to proceed with this project. Additional information, including design calculations may be requested to further evaluate the Plan.

All proposed stormwater pollution prevention measures and those referenced in this review must meet the design criteria and standards set forth in the "Indiana Stormwater Quality Manual" from the Indiana Department of Natural Resources, Division of Soil Conservation or similar Guidance Documents.

Please direct questions and/or comments regarding this plan review to:
Eric Kurtz, Urban Conservationist
Please refer to the address and contact information identified in the Plan Review Section on page 1

Assessment of Construction Plan Elements *(Section A)*

The Construction Plan Elements are adequately represented to complete a plan review:
☑ Yes ☐ No

The items checked below are deficient and require submittal to meet the requirements of the rule.

A			A		
☐	1	Index showing locations of required Plan Elements	☐	2	11 by 17 inch plat showing building lot numbers/boundaries and road layout/names
☐	3	Narrative describing the nature and purpose of the project	☐	4	Vicinity map showing project location
☐	5	Legal Description of the Project Site (Include Latitude and Longitude - NOI Requirement)	☐	6	Location of all lots and proposed site improvements (roads, utilities, structures, etc.)
☐	7	Hydrologic unit code (14 Digit)	☐	8	Notation of any State or Federal water quality permits
☐	9	Specific points where stormwater discharge will leave the site	☐	10	Location and name of all wetlands, lakes and water courses on and adjacent to the site
☐	11	Identification of all receiving waters	☐	12	Identification of potential discharges to ground water (abandoned wells, sinkholes, etc.)
☐	13	100 year floodplains, floodways, and floodway fringes	☐	14	Pre-construction and post construction estimate of Peak Discharge (10 Year storm event)
☐	15	Adjacent landuse, including upstream watershed	☐	16	Locations and approximate boundaries of all disturbed areas (Construction Limits)
☐	17	Identification of existing vegetative cover	☐	18	Soils map including soil descriptions and limitations
☐	19	Locations, size and dimensions of proposed stormwater systems (e.g. pipes, swales and channels)	☐	20	Plans for any off-site construction activities associated with this project (sewer/water tie-ins)
☐	21	Locations of proposed soil stockpiles and/or borrow/disposal areas	☐	22	Existing site topography at an interval appropriate to indicate drainage patterns
☐	23	Proposed final topography at an interval appropriate to indicate drainage patterns			

Construction/Stormwater Pollution Prevention Plan - Technical Review and Comment *(Form 1)*

Project Name: Sturgis Iron & Metal Heavy Shredder Site
Date Reviewed: 06/22/05

Assessment of Stormwater Pollution Prevention Plan *(Sections B & C)*

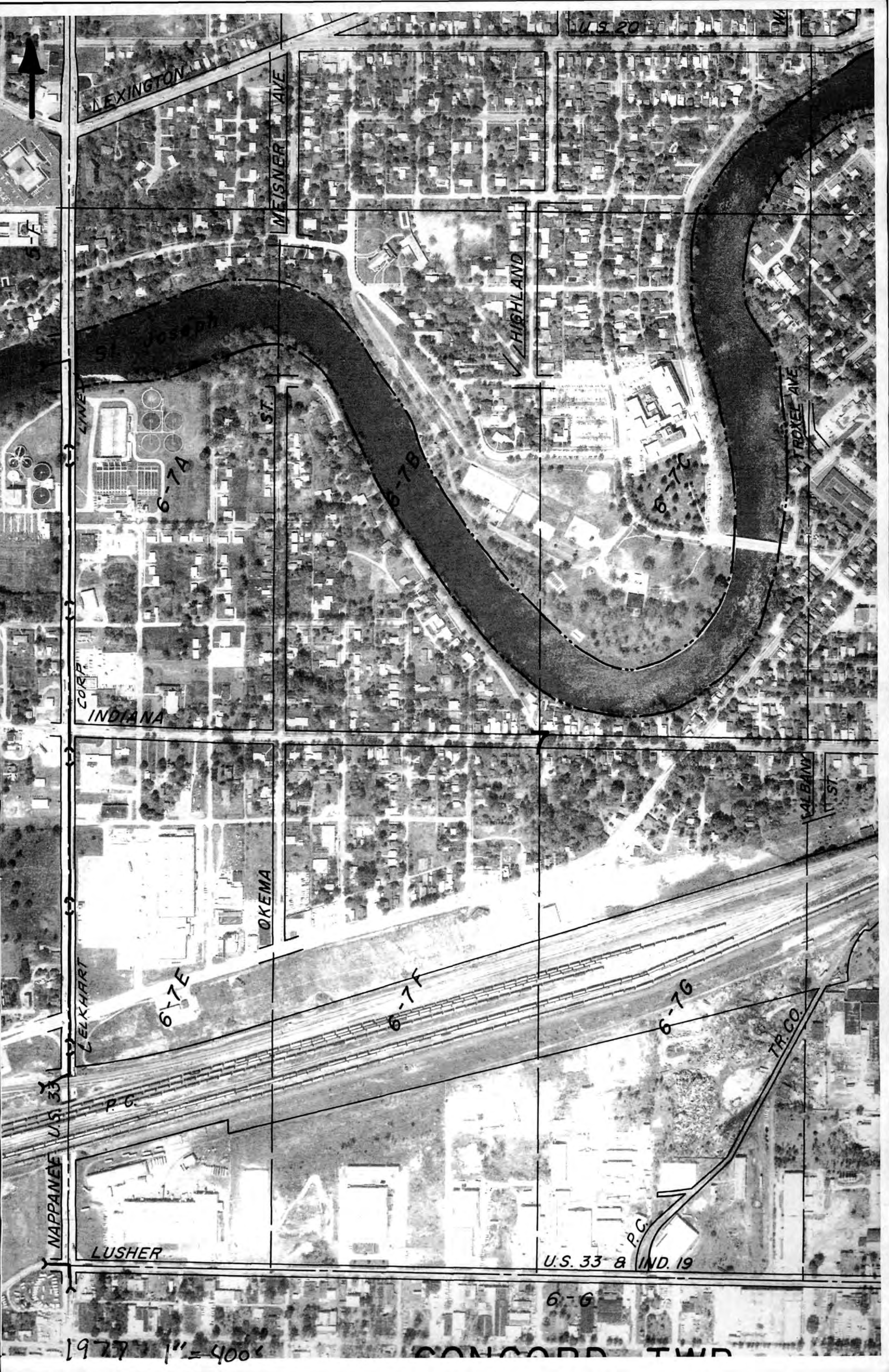
Stormwater Pollution Prevention Plan - Construction Component *(Section B)*

Adequate	Deficient	Not Applicable	B	
				The construction component of the Stormwater Pollution Prevention Plan includes stormwater quality measures to address erosion, sedimentation, and other pollutants associated with land disturbance and construction activities. Proper implementation of the plan and inspections of the construction site are necessary to minimize the discharge of pollutants. The Project Site Owner should be aware that unforeseen construction activities and weather conditions may affect the performance of a practice or the effectiveness of the plan. The plan must be a flexible document, with provisions to modify or substitute practices as necessary.
☑	☐	☐	1	Description of potential pollutant sources associated with construction activities
☑	☐	☐	2	Sequence describing stormwater quality measure implementation relative to land disturbing activities
☑	☐	☐	3	Stable construction entrance locations and specifications (at all points of ingress and egress)
☑	☐	☐	4	Sediment control measures for sheet flow areas
☑	☐	☐	5	Sediment control measures for concentrated flow areas
☑	☐	☐	6	Storm sewer inlet protection measure locations and specifications
☐	☐	☑	7	Runoff control measures (*e.g. diversions, rock check dams, slope drains, etc.*)
☑	☐	☐	8	Storm water outlet protection specifications
☐	☐	☑	9	Grade stabilization structure locations and specifications
☑	☐	☐	10	Location, dimensions, specifications, and construction details of each stormwater quality measure
☑	☐	☐	11	Temporary surface stabilization methods appropriate for each season (*include sequencing*)
☑	☐	☐	12	Permanent surface stabilization specifications (*include sequencing*)
☑	☐	☐	13	Material handling and spill prevention plan
☑	☐	☐	14	Monitoring and maintenance guidelines for each proposed stormwater quality measure
☐	☐	☑	15	Erosion & sediment control specifications for individual building lots

Stormwater Pollution Prevention Plan - Post Construction Component *(Section C)*

Adequate	Deficient	Not Applicable	C	
				The post construction component of the Stormwater Pollution Prevention Plan includes the implementation of stormwater quality measures to address pollutants that will be associated with the final landuse. Post construction stormwater quality measures should be functional upon completion of the project. Long term functionality of the measures are critical to their performance and should be monitored and maintained.
☑	☐	☐	1	Description of pollutants and their sources associated with the proposed land use
☑	☐	☐	2	Sequence describing stormwater quality measure implementation
☑	☐	☐	3	Description of proposed post construction stormwater quality measures *(Include a written description of how these measures will reduce discharge of expected pollutants)*
☑	☐	☐	4	Location, dimensions, specifications, and construction details of each stormwater quality measure
☑	☐	☐	5	Description of maintenance guidelines for post construction stormwater quality measures


6-16A
19th
6-18B
6-18C
CORP.
15th
6-18D
NAPPANEE
HIVELY
ELKHART
18
AVE
6-18E
MISHAWAKA
6-18F
6-18G
GH 20
6-18H
LINE
OAKLAND



LEXINGTON
MEISNER AVE
U.S. 20
HIGHLAND
TROXEL AVE
St. Joseph
LINE
6-7A
6-7B
6-7C
ST.
CORP
INDIANA
ALBANY
ST.
OKEMA
ELKHART
6-7E
6-7F
6-7G
TR.CO.
P.C.
U.S. 33
NAPPANEE
LUSHER
U.S. 33 & IND. 19
6-G
5-F
1977 1"=400'
CONCORD TWP

1977
1" = 400'
6-6
U.S. 33 & IND. 19
P.C.
OAKLAND AVE
TR. CO.
6-7H
TR. CO.
6-7G
6-7F
OKEMA
ALBANY
ST.
AVE.
AVE.
6-7D
TROXEL AVE.
6-7C
6-7B
ST.
HIGHLAND
MEISNER AVE.
6
AVE
WARD
U.S. 20
6
6

8-20-65

1" = 660 ft.

Franklin

Lusher

SR 19

Hively

17th

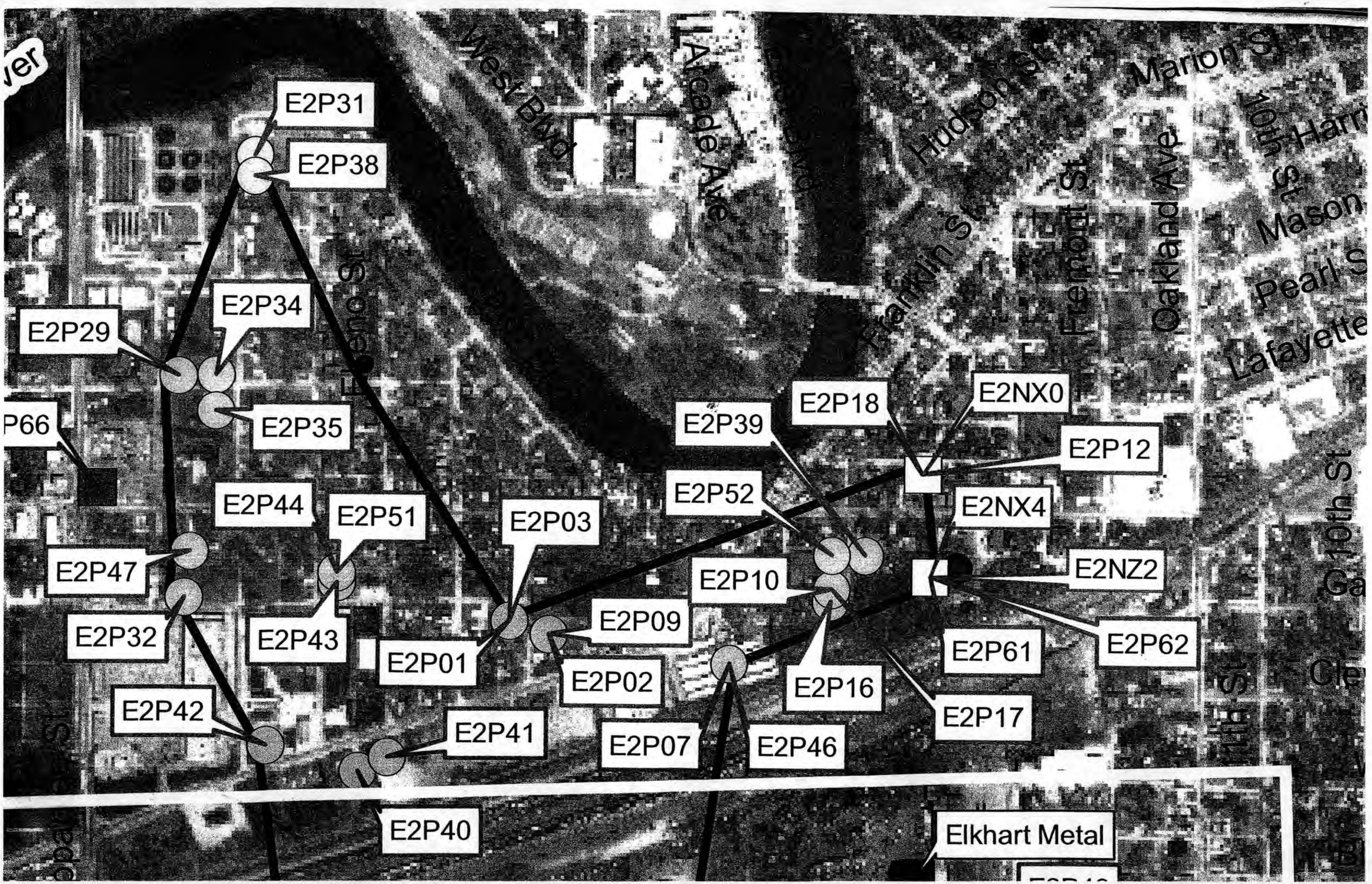
Oak Rd

CR 7

CR 20

18


5R 19
Lusher
Franklin
17th
Oakland


ver
West Blvd
Arcade Ave
Hudson St
Marion St
10th St
Harri
Mason
Pearl S
Lafayette
Franklin St
Fremont St
Oakland Ave
E2P31
E2P38
E2P34
E2P29
E2P35
P66
E2P44
E2P51
E2P03
E2P47
E2P32
E2P43
E2P01
E2P09
E2P02
E2P42
E2P41
E2P40
E2P39
E2P18
E2NX0
E2P12
E2P52
E2NX4
E2P10
E2NZ2
E2P16
E2P61
E2P62
E2P17
E2P07
E2P46
10th St
Elkhart Metal

E2P40
Elkhart Metal
E2P49
E2NY6
Flexible Foam Products
Gaska Tape Inc.
E2NZ0
E2P26
E2P50
E2P19
Walerko Tool
Lusher Ave
E2P45
E2NY9
E2P13
E2P23
E2P37
E2P64
E2P11
B-D Industries
E2P08
E2P33
E2P04
E2P58
E2P27
E2P06
Leininger Ave
E2P21
E2P14
E2P48
Hively Ave


KLAND
AVE
ELKHART
HIVELY
WAPAHANI
6-18D
15th
CORP
6-18C
6-18B
15th
6-18A
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AVE
AVE
6-A
U.S. 33
IND 19
LUSHER

1977
1" = 400'

FedEx Express US Airbill

FedEx Tracking Number 8634 2968 2871

Form ID No. 0215

Recipient's Copy

1 From This portion can be removed for Recipient's records.

Date 72308 FedEx Tracking Number 863429682871

Sender's Name ARTHUR SIEGAL Phone 248 351-3000

Company JAFFE RAITT HEUER & WEISS

Address 27777 FRANKLIN RD STE 2500 Dept./Floor/Suite/Room

City SOUTHFIELD State MI ZIP 48034-8222

2 Your Internal Billing Reference SIMCO-DISB

3 To

Recipient's Name MS GRACE CO Phone

Company USEPA REGION 5 (SR-6J)

Recipient's Address 77 W. JACKSON BLVD

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Address

To request a package be held at a specific FedEx location, print FedEx address here.

City CHICAGO State IL ZIP 60604-3590

RECIPIENT: PEEL HERE

0369157030

8634 2968 2871

4a Express Package Service *Packages up to 150 lbs.*

- [X] FedEx Priority Overnight — Next business morning.* Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- [ ] FedEx Standard Overnight — Next business afternoon.* Saturday Delivery NOT available.
- [ ] FedEx First Overnight — Earliest next business morning delivery to select locations.* Saturday Delivery NOT available.
- [ ] FedEx 2Day — Second business day.* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- [ ] FedEx Express Saver — Third business day.* Saturday Delivery NOT available.

FedEx Envelope rate not available. Minimum charge: One-pound rate. * To most locations.

4b Express Freight Service *Packages over 150 lbs.*

- [ ] FedEx 1Day Freight* — Next business day.** Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- [ ] FedEx 2Day Freight — Second business day.** Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- [ ] FedEx 3Day Freight — Third business day.** Saturday Delivery NOT available.

* Call for Confirmation: ** To most locations.

5 Packaging

- [ ] FedEx Envelope*
- [ ] FedEx Pak* — Includes FedEx Small Pak, FedEx Large Pak, and FedEx Sturdy Pak.
- [ ] FedEx Box
- [ ] FedEx Tube
- [X] Other

* Declared value limit $500.

6 Special Handling Include FedEx address in Section 3.

- [ ] SATURDAY Delivery — Not available for FedEx Standard Overnight, FedEx First Overnight, FedEx Express Saver, or FedEx 3Day Freight.
- [ ] HOLD Weekday at FedEx Location — Not available for FedEx First Overnight.
- [ ] HOLD Saturday at FedEx Location — Available ONLY for FedEx Priority Overnight and FedEx 2Day to select locations.

Does this shipment contain dangerous goods? One box must be checked.

- [X] No
- [ ] Yes — As per attached Shipper's Declaration.
- [ ] Yes — Shipper's Declaration not required.
- [ ] Dry Ice — Dry Ice, 9, UN 1845 ____ x ____ kg
- [ ] Cargo Aircraft Only

Dangerous goods (including dry ice) cannot be shipped in FedEx packaging.

7 Payment *Bill to:* Enter FedEx Acct. No. or Credit Card No. below. Obtain Recip. Acct. No.

- [X] Sender — Acct. No. in Section 1 will be billed.
- [ ] Recipient
- [ ] Third Party
- [ ] Credit Card
- [ ] Cash/Check

Total Packages Total Weight Credit Card Auth.

†Our liability is limited to $100 unless you declare a higher value. See the current FedEx Service Guide for details.

8 Residential Delivery Signature Options If you require a signature, check Direct or Indirect.

- [ ] No Signature Required — Package may be left without obtaining a signature for delivery.
- [ ] Direct Signature — Someone at recipient's address may sign for delivery. *Fee applies.*
- [ ] Indirect Signature — If no one is available at recipient's address, someone at a neighboring address may sign for delivery. *Fee applies.*

519

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